

Sustainability Appraisal (SA) of Walsall Site Allocation Document (SAD) and Walsall Town Centre Area Action Plan (AAP) Non-Technical Summary

Introduction

This is a plain language summary of the sustainability appraisal (SA) of two new plans being prepared by Walsall Council, to allocate land for homes, jobs and shops. The first is the Site Allocation Document (SAD). The other is the Walsall Town Centre Area Action Plan (AAP). Together with the Black Country Core Strategy (BCCS), which provides the strategic policies, and some remaining Unitary Development Plan (UDP) policies, they will form the Local Plan for Walsall.

Overview of Walsall Site Allocation Document and Walsall Town Centre Area Action Plan

The SAD and AAP will:

- Update the UDP Proposals Map to take account of BCCS policies
- Identify land for a supply of housing to meet the targets set by the BCCS and national planning policy guidance
- Allocate sites to meet the needs of gypsies, travellers and travelling show-people
- Allocate sites for employment development, in order to maintain the Borough's economic base and encourage new investment
- Work out what we need to do about infrastructure needed in Walsall to support the levels of development and growth proposed in the BCCS
- Provide a strategy for investment in Walsall Town Centre
- Identify Walsall's natural and built environmental assets, and constraints to development

Both plans will therefore include the following elements:

- **Policies Map** - showing sites proposed for protection/safeguarding, and sites proposed for new development; and
- **Site Allocation Policies** – identifying specific requirements for new development proposed on or near to the sites identified on the Policies Maps.

The SAD objectives are based on the BCCS Spatial Objectives (see **Chapter 3**), but are more locally specific, reflecting the Council's aspirations for Walsall Borough. The AAP objectives

have been developed out of the objectives for the Strategic Centre identified in the BCCS, the objectives of the Council’s Corporate Plan, and the Council’s aspirations for the regeneration of the Town Centre.

The SA Process

By law, the Council must carry out a SA and a **strategic environmental assessment (SEA)** of local plans before they are formally approved. An SA is an overall assessment of the effects of the plan on the environment, local communities and the economy. An SEA is based on a European Union Directive and means we must cover mainly environmental effects and the reasonable alternatives of the proposed plan. Because there are significant overlaps between SA and SEA, we have combined them into a single assessment framework.

The assessment framework is used to identify and evaluate the impact of the SAD and AAP proposals on the economy, society and the environment. By doing this assessment we can improve the SAD and AAP as they are developed, or, where necessary, lessen harmful impacts (‘mitigation’).

A **Habitats Regulations Assessment (HRA)**, which assesses the impact of the SAD and AAP on nature conservation sites of European Importance, has been carried out at the same time as the SA. This type of assessment has to be done in a different way, so it is separate, but the SA has taken account of the results.

SA of Walsall SAD and AAP – Key Stages

The SA has been carried out in stages, as the SAD and AAP develop. This has allowed us to identify potential problems early on, and to change the proposals or identify other ways of dealing with negative effects where possible.

Walsall SAD and AAP – SA Stages

SAD & AAP Stage	SA Stage	SA Reports
1. Evidence Gathering	1. Scoping	SA Scoping Report
2. Issues & Options	2. Options Appraisal	Options Appraisal Report
3. Preferred Option	3. Appraisal of Preferred Options	Publication of Appraisals
4. Publication	4. Appraisal of Final Plan	Final SA Report
5. Submission (Pre-Submission Main Modifications)	5. Appraisal of Significant Changes (Main Modifications)	Revised SA Report

6. Examination	6. Appraisal	Supplementary SA Report (if necessary)
7. Inspector’s Report	7. Review Inspector’s Recommendations	N/A
8. Adoption	8. Adoption	SA Adoption Statement
9. Monitoring and Implementation	9. Monitoring of Significant Effects	Annual Monitoring Report

The results of the appraisals carried out at each stage have been published, so that when public consultation takes place, people can comment on the SA appraisals as well as on the draft plan.

We are now at Stage 5 of the SA – **Submission** stage. Revisions to the Appraisal (and the Assessment) under the Habitats Regulations have triggered the legal requirement for consultation on the SA. This has also provided the opportunity for consultation to be undertaken on some **pre-submission modifications** to ensure that the Council’s plans are as ready as possible for submission to the Secretary of State.

SA Stage One: Scoping

In relation to scoping the first thing we need to do is show how the plan relates to other relevant plans, policies and programmes. The SAD and AAP will also have to comply with **European Directives** and **UK legislation** on environmental, economic and social issues. They will also be expected to be consistent with **national policy** on planning and wider environmental, economic, and social issues.

These are explained in more detail in the full SAD **Chapter 3**, and **Appendix Oi and Oii** give fuller details.

Key Sustainability Issues Facing Walsall

We have looked at the current state of the environment and what would have happened if we did not implement the SAD and AAP. Establishing the baseline conditions helps us to understand the types of issues the SAD and AAP will have to deal with. It also helps us to identify the “indicators” we can use to measure the impacts of development proposed in the SAD and AAP once they are in place. A description of current baseline conditions can be found in the main SA Report, and a brief summary is provided below:

The strategic **transport** network includes the M6 motorway, including Junctions 9 and 10 as well as an extensive network of ‘A’ roads. Walsall has several rail lines, including the Chase

Line from Birmingham to Rugeley, and in addition to a station serving Walsall town centre there are two more in Bloxwich. The Walsall Canal, Tame Valley and Wyrley and Essington canal cross the Borough. These are not used to convey goods but provide recreational assets. Walsall's canals, railway lines, historic town centres, industrial buildings and older housing areas are important features of the townscape and are also important elements of the borough's **cultural heritage**.

The eastern part of the Borough has some of the best and most versatile agricultural **land**. However, much the brownfield land is contaminated and subject to mining legacy issues as a result of Walsall's industrial past.

All the **groundwater** in Walsall has been designated by the Environment Agency as Drinking Water Protected Areas and Nitrate Vulnerable Zones. The overall quality of the water in most of the borough's rivers, streams and groundwater bodies is not currently meeting the "good" standard required by the Water Framework Directive.

Within Walsall there are 8 Sites of Special Scientific Interest (SSSIs) and 38 Sites of Importance for **Nature Conservation** (SINCs), which include important areas of lowland heathland, woodland and wetland habitat.

The **Cannock Extension Canal** is a Special Area of Conservation (SAC) of international importance, because it supports floating water plantain, which is an internationally rare species. The Core Strategy HRA ruled out any adverse effects from the Core Strategy proposals. The Core Strategy HRA also indicated that there was potential for some Walsall housing developments to increase visitor pressure on the **Cannock Chase** SAC, located approximately 8km north of the borough boundary.

Unlike many other urban areas, Walsall has significant **mineral resources** of local and national importance, comprising coal, sand and gravel, brick clay and limestone. In Darlaston, Willenhall, Moxley, the Town Centre and Rushall, some sites are affected by potential contamination and ground instability as a result of the legacy of historic industrial and mining activities

Air quality is an important issue in Walsall. There are high levels of air pollution in several road corridors in Walsall, notably the M6 corridor where nitrogen dioxide limits are being exceeded, as well as particulates from vehicles. Road traffic is the main generator of **noise** in Walsall. The main sources of carbon dioxide emissions are energy consumption and transport in Walsall, as elsewhere.

Parts of Walsall are potentially vulnerable to unavoidable **climate change** effects which the evidence suggests are already starting to happen, such as heavy rainfall events. Because

Walsall sits on the watershed between the River Trent and Severn, Areas at risk from **flooding** in Walsall comprise land near the River Tame, Ford Brook and Sneyd Brook. As is the case with many urban environments, areas of Walsall are also at risk of surface water flooding.

Walsall's **economic base** is largely dependent on manufacturing industry. Its unemployment rate is persistently higher than nationally and regionally. The highest concentrations of unemployment and low incomes are found in south Willenhall, Bloxwich and central Walsall, which also tend to have the highest concentrations of environmental and social problems. By contrast, the areas with the highest levels of employment and high incomes are found in north Bloxwich, Aldridge, and Streetly which are also the areas with the fewest environmental and social problems.

Walsall Town Centre is the Borough's main commercial and shopping centre. There are District Centres of Aldridge, Brownhills, Darlaston, Bloxwich and Willenhall. There are 35 local centres, and out-of-centre retail parks at Redwood, Owen Road and close to Junction 10.

Walsall's **population** is 270,000 according to the 2011 Census and increasing. There is a higher proportion of children and young people, and those over 65, than the average for England and Wales. Non- whites make up around 17% of the population. Walsall includes some of the most deprived areas in the country but there are significant differences across the borough. The 2015 Index of Multiple **Deprivation** shows that the western and central areas of the borough are amongst the most deprived areas in the country.

In relation to **health**, average life expectancy and healthy life expectancy for both males and females is below the West Midlands and England. The overall health of people in Walsall is also poor compared to the national average.

Home ownership in Walsall is similar to the national average at 62.9%. However, the socially rented sector in Walsall is stronger, with a lower than average number of private rented properties. A quarter of households are living in socially rented accommodation, more than for England and Wales as a whole. . Conversely, there is a lower proportion of households living in privately-rented accommodation Walsall.

What would happen if we did not implement the SAD and AAP.

- Existing pressure for housing development on greenfield sites, including sites for gypsies, travellers and travelling showpeople, is likely to continue
- Existing ground condition problems could remain
- Environmental improvements are likely to be sporadic, localised and site-specific instead of comprehensive

- Nature conservation sites and historic sites of local importance are likely to be more vulnerable to loss or harm
- Going forward, the borough’s infrastructure, buildings and open spaces are likely to become more vulnerable to the unavoidable effects of climate change, unless more adaptation measures are put in place to protect existing and new development from these threats.
- further decline in the local economy, and higher rates of unemployment, without further investment in new businesses and jobs and more diversification into other sectors;
- Walsall Town Centre could deteriorate
- There is a risk that the infrastructure needed to support economic growth will not be developed, making Walsall a less attractive area to invest
- There is unlikely to be scope for significant improvement in the rates of deprivation in some areas of the borough, unless the underlying social, economic and environmental problems are addressed, including those relating to the quality of the environment and access to employment, housing and key facilities and services
- Access to employment, services and social infrastructure could become more difficult for local communities in Walsall without continued investment in public transport

Development of the SA Framework

The framework is structured around fourteen **SA Objectives**, one for each SA Topic. The table below lists the SA objectives. We have identified **Criteria and Indicators** linked to each SA Objective, to guide the appraisal process. For further details see **Appendices A and B** of the main report. The SA process involves checking whether options would have positive, negative, neutral or uncertain effects on each of the SA Objectives, using the SA Criteria and Indicators. Where positive or negative effects are identified, we also have to consider how significant they would be. The results are recorded in the **SA Matrix** where the predicted effects on the SA Objectives are shown by symbols and colours.

1: Air Quality	8: Health & Wellbeing
2: Biodiversity & Geodiversity	9: Landscape & Townscape
3: Climate Change	10: Material Resources
4: Communities & Population	11: Renewable & Low Carbon Energy
5: Cultural Heritage	12: Soil & Ground Conditions
6: Economy & Centres	13: Transport & Accessibility
7: Equality & Diversity	14: Water Environment

SA Stage Two: Options Appraisal

The first stage of plan development involved identifying the objectives of the SAD and AAP, the key issues they need to look at, and the options available. These were identified in the Issues & Options Plans (April 2013). Before the plans were published, the second stage of SA was carried out, which was in two parts:

- **Objectives Testing** - checking that the objectives for the SAD and AAP are compatible with the SA Objectives; and
- **Options Appraisal** - identifying and assessing all of the “reasonable” options identified for the SAD and AAP.

SAD and AAP Objectives Testing

The results of testing the Objectives of the Publication version of the SAD are recorded in the Revised SAD Objectives Compatibility Matrix (Excel Spreadsheet), and in **Appendix F** of the main SA report. The Appendix identifies the changes made to the Objectives when the Preferred Options were identified in July 2015, and before the final plan was published in January 2016. The most recent changes to the SAD and AAP objectives were simply additions to the wording and therefore had no impact on the objectives testing findings.

The SAD and AAP objectives are much the same as the SA objectives. The only area of tension is between SAD Objective 10, relating to mineral resources and production, and SA objectives 2, 9 and 12, dealing with protection of the natural environment and landscape and transport. This tension is because the SAD identifies suitable sites for minerals working. This might put more pressure on local transport networks and involve greenfield sites in the Green Belt.

In relation to the AAP there is tension between AAP Objective 7, to improve access to the town centre by all types of transport and SA objectives 1 and 3, because this might imply deterioration in air quality.

There were several options assessed in relation to mitigating the potential for effects of the SAD on Cannock Chase SAC. The appraisal of these options, representations made and the council’s interpretation of advice received has resulted in the identification of a new option to those that were identified at the time of the Draft Plan stage. Option 2a proposes that the council enters into a side agreement to the approach that is currently being operated by other authorities that are within an area where it is thought a net increase in residential development will result in significant effects to Cannock Chase SAC. This option would commit the council to obtain developer contributions from residential development proposals within 8km of the SAC that come forward unexpectedly as windfalls, not in line

with the residential allocations of the SAD. The available evidence is currently used to support the requirement for developer contributions to be sought from residential development within 8km of the SAC to mitigate the effects of residential development. The creation of option 2a is, in part, a result of the council's concerns relating to the implications from potentially being required to seek developer contributions beyond 8km of the SAC in order to satisfy European legislation, were it to become a signatory of the strategic mitigation approach currently in operation (SA option 2). The council's interpretation of legal advice received substantiates these concerns and supports the decision not to become a signatory of SA option 2. Particularly as the delivery of many brownfield sites, which form a significant proportion of Walsall's housing capacity, and the contribution to be made by residential windfalls housing are contained within an area that, is significantly affected by costs associated with overcoming a well documented set of constraints to development. The selection of this option is discussed in **Appendix H** of the SA Report, and the HRA screening report that accompanies the SAD and AAP contains more information regarding its selection. The Council intends to proceed with this option, and on the basis that the SAD proposes no residential allocations within 8km of the SAC has reached the conclusion that as a result of implementing the SAD and AAP there will be no likely significant effects for Cannock Chase SAC..

SAD and AAP Options Appraisal

The choice of Options available has reflected the need to deliver the BCCS. Some Options that might otherwise be considered are not appropriate for the SAD and AAP – for example if they would involve proposing development that is contrary to the Black Country spatial strategy.

The Council has identified 32 sets of alternative Options for the SAD under 9 topic areas, based on the structure of the plan and the types of land use it needs to make provision for. A total of 101 separate Options have been identified. A full listing of all of the Options identified for the SAD can be found in **Appendix H**.

The Options identified for the SAD are not site-specific – they are based on different approaches towards delivering the BCCS requirements or local requirements for each type of development. It would not have been feasible or helpful to have carried out a detailed appraisal of every site-specific option for the SAD, because this would have involved appraising hundreds of individual sites. But some options identified included groups of sites, or assumed that particular sites would be included. In these cases the appraisal did consider the overall effects of allocating these sites. The main overall results of the Options Appraisal are summarised below.

The AAP Options are more detailed than those for the SAD and many relate to policy or land use choices for particular sites or areas of the Town Centre. As with the SAD, the Options for the AAP have been refined at each stage in the development of the plan, to take into

account the outcome of the public consultation on the plan and the comments made on the options for the Town Centre.

As a result of this, there are many more options for the AAP than there are for the SAD. The Council has identified 47 sets of alternative options, and 144 options in total. A full listing of the Options identified for the AAP can be found in **Appendix I**.

Options Appraisal – Options Rejected

Some of the Options identified were rejected by the Council during the course of the plan preparation process because they were not considered to be realistic options for the SAD and AAP. These Options have been excluded from the Options Appraisal, because the Council is only obliged to consider ‘reasonable alternatives.’¹ The Options which have been rejected for this reason are listed in **Appendices L and M** of this report, which explain why they are not considered ‘reasonable.’

SA Stage Three: Appraisal of Preferred Options Draft Plans

Options Appraisal Outcomes and Reasons for Choosing Preferred Option

The results of the options appraisal are set out in the **Revised SAD and AAP Options Appraisal Completed Matrix**.

In relation to the SAD, the only Preferred Options where negative effects have been identified are:

- Sand and Gravel Extraction - Minerals Option 4b: BCCS Areas of Search Only;
- Brick Clay Extraction – Minerals Option 5a: Stubbers Green Area of Search and Permitted Sites Only;
- Fireclay Extraction - Minerals Option 6d: Do not Identify Yorks Bridge Area of Search - Rely on Existing Local Plan Policy; and
- Minerals Site Allocations - Minerals Option 8a: Allocate Sites for Mineral Extraction.

In the case of Minerals Options 4b and 5a, the effects are predicted to be significant. Unfortunately, such effects will be inevitable if mineral extraction takes place in the locations identified, and it is not possible to identify any ‘reasonable’ alternatives for the SAD that could prevent these effects.

In relation to the AAP, the only negative effect was in relation to Cultural and Community Facilities Option 8 – no provision for outdoor events, as it would reduce the likelihood of

¹ See Article 5 of SEA Directive (2001/42/EC).

major outdoor events taking place in the Town Centre, and therefore there could be opportunity costs/ economic impacts from the loss of the potential increased footfall/ expenditure that such events bring. This is being mitigated in the AAP through the Market policy AAPS3 which looks to protect the space for public events as the new market design allows for dismantlable stalls creating a space right at the heart of the centre.

Policies Appraisal Outcomes

The table below provides an overview of the appraisals of the policies in both the SAD and AAP under the main headings of the SA report findings.

	SAD	AAP
Positive Effects	<p>Many of the policies will have positive effects because of the concentration of development in areas that are in need of regeneration. Policies will allocate and direct housing to locations close to facilities that can be reached on foot, including specialist housing, in areas that have a high degree of deprivation and to meet the needs of gypsies and travellers. Local centres polices dovetail with this by protecting facilities with easy reach of the widest range of people.</p> <p>Industry is also protected and largely allocated in these areas that are suffering high unemployment.</p>	<p>Many of the policies have a significant impact in terms of SA Objective Economy and centres as they look to concentrate and attract investment in Walsall supporting businesses and providing jobs. As well as economic positives impacts the AAP includes a number of policies which have significant positive impacts in terms of SA Objective Landscape and Townscape. For example policies look to protect and enhance the historic environment of the centre whilst requiring good design and improvements to public realm. A number of the policies also have significant positive effects on SA Objective Soil and Ground Contamination as the town centre is brownfield and in some areas contaminated the allocation of sites for development will result in ground contamination being cleared. Naturally a number of the transport policies have significant positive impacts on SA Objective Transport and Accessibility as they look to make the town centre which is already very accessible even more accessible by sustainable modes of transport through for example improvements to the bus station and pedestrian access.</p>
Negative Effects	<p>Some industrial and waste management sites are close to people living deprived areas, who could also suffer poorer air quality on balance. Some residents could also be affected by increased traffic from industrial developments and mineral extraction. However, existing</p>	<p>Whilst no significant negative effects where identified the following negative effects have been:</p> <p>The allocation of Bradford Place for expansion has a potential negative impact on SA Objective Cultural Heritage as the</p>

	<p>policies from the UDP and BCC can mitigate and regulate industry close to housing.</p> <p>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.</p>	<p>development will potentially result in the loss if some surrounding buildings. This should however, be mitigated in some parts by the overall improvements to the area through a better functioning bus station with improved public realm and linkages.</p> <p>Policy AAPT5 which allocates for the delivery of a new multi-storey car park has been identified as having a potential negative impact on SA Objectives Air Quality and Climate Change as it can be seen as promoting car usage and increasing the level of emissions. This will be mitigated against to some extent by other policies in the AAP which promote public transport and cycling. The policy also looks to promote recharging facilities for low emission vehicles.</p> <p>Policy AAPINV3 which addresses car parking at Gigaport has been identified as having a potentially negative impact on SA Objectives Air Quality and Climate Change as it can be seen as promoting car usage and increasing the level of emissions. The policy has also been identified as having a potential negative impact on SA Objectives Landscape and Townscape as car parking is not necessary the most positive use of land and can have a negative impact on an areas character. This should however be mitigated through the design process of the application and through the policies within the AAP which require a comprehensive approach to schemes, strong frontages and good design.</p>
<p>Positive effects on equality and diversity</p>	<p>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.</p>	<p>Policies AAPS1 – AAPS3 and AAPI5: The Primary Shopping Area (PSA) focused around Park Street is the most accessible location in the centre served by car parks and public transport, so concentrating retail development including the Market in</p>

<p>Many of these locations are in areas of the borough that currently experience multiple deprivation, include low incomes, high unemployment and poor health.</p> <p>Policy HC3: 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.</p> <p>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.</p> <p>Policies IND1 – IND5: These policies protect existing industrial land and identify 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.</p> <p>Policies SLC1 – SLC2: One of the key positive outcomes of both the local centre policies is that they look to</p>	<p>this area will ensure that key shopping facilities will continue to be accessible to as many Walsall residents as possible.</p> <p>Policies AAPB1 and AAPI3: Identification of the Gigaport area as the primary location for office development and proposals to improve linkages to the rest of the Town Centre will help to create an office environment that is accessible to as many Walsall residents as possible.</p> <p>Policy AAPB2: Proposal to create a Social Enterprise Zone around the Goldmine Centre should have an overall positive impact on equality and diversity, as these enterprises are often focussed around the needs of the local community.</p> <p>Policies APPLE1 – APPLE4 and AAPI4: Focusing new leisure development around the Waterfront area, protecting and enhancing the canalside environment and current cultural and sports facilities such as the Gala Baths and the Leather Museum, and promoting the development of new hotel, conference and banqueting facilities in accessible locations is likely to have positive effects on equality and diversity as it will ensure that these facilities are accessible to as many Walsall residents as possible.</p> <p>Policies APPLV1 – AAPLV8: Identifying sites for housing development in the Town Centre, supporting the expansion of Walsall College, encouraging provision of new healthcare facilities in the Town Centre and promoting improvements to the Town Centre environment is likely to have positive effects on equality and diversity, as it will help provide new homes in areas where there is good access to facilities, and improve the amenity for existing and future residents, and for those who</p>
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	<p>ensure facilities such as local shops, doctors and community centres are in accessible locations for the communities they serve.</p> <p>Policies T2 – T5: These policies safeguard the Walsall - Brownhills line is continued. If rail services were reintroduced this would greatly improve public transport accessibility for people without a car.</p>	<p>depend on the Town Centre for shopping, leisure and work.</p> <p>Policies AAPT1 – AAPT5: Identifying priorities for transport improvements in the Town Centre, including improvements to pedestrian links, cycle routes, cycle parking facilities, public transport interchanges, roads, and car parking provision, will help to create a more accessible centre that will serve the community better and improve access to the Town Centre by a choice of transport modes, including public transport, walking and cycling. Improving parking provision for cars and mobility vehicles will also address the needs of people with mobility disabilities who rely on these means of transport to access the Town Centre.</p>
<p>Negative effects on equality and diversity</p>	<p>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, requiring new developments to address any harmful effects on amenity likely to arise from pollution.</p> <p>Policy W2: Some Strategic Waste Sites identified 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.</p> <p>Policies W3 and W4: Some Potential Waste Sites identified may be served by haulage routes which are close to residential areas, some of which are affected by high levels of deprivation and high levels of noise and</p>	<p>Policy AAPLE1: Focusing new leisure development around the Waterfront area could have some negative effects on equality and diversity if ‘drive-through’ restaurant facilities are proposed which are inaccessible to pedestrians or those using public transport. The policy has sought to mitigate the effects of this by requiring new leisure developments in the Town Centre to be accessible to all, and to create a welcoming and safe environment for everyone.</p> <p>Policy AAPT5: There may be some individual members of the community who use the car parks proposed for redevelopment to meet a specific need, for example, people who rely on cars or mobility vehicles to get around. However given that the car parks have been identified for redevelopment due to low levels of usage, any potential harmful effects from this are likely to be limited. The proposal within the same policy for a new multi storey car park in a location that better serves the Town Centre as a whole will</p>

	<p>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 and the SAD policies clarify that these will apply.</p> <p>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. 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.</p>	<p>also help mitigate any potential harmful effects of redeveloping some of the existing car parks. There will be further opportunities to evaluate and mitigate the effects of the proposals at the planning application stage.</p>
<p>Positive effects on health and wellbeing</p>	<p>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</p>	<p>Policies AAPS1 – AAPS3 and AAPI5: The Primary Shopping Area (PSA) focused around Park Street is the most accessible location in the centre, so concentrating retail development including the Market in this area will ensure that key shopping</p>

	<p>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.</p> <p>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.</p> <p>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.</p>	<p>facilities will continue to be accessible to as many Walsall residents as possible. Application of these policies will also ensure that new development is integrated into the existing urban fabric and is well designed, and that there are adequate pedestrian linkages between peripheral development and the PSA, thereby encouraging smarter and healthier means of travel between different parts of the Town Centre.</p> <p>Policies AAPB1 and AAPB3: Identification of the Gigaport area as the primary location for office development and proposals to improve linkages to the rest of the Town Centre will help to create an office environment that is accessible to as many Walsall residents as possible by a choice of transport modes, including walking and cycling routes, and will create more opportunities for employment within the centre.</p> <p>Policy AAPB2: Proposal to create a Social Enterprise Zone around the Goldmine Centre should have an overall positive impact on health and wellbeing, as these enterprises are often focussed around the needs of the local community.</p> <p>Policy AAPB3: The operation of some industry on ‘Consider for Release’ sites in the Town Centre affects local air quality, and thus health, for nearby residents, so encouraging this industry to relocate to more suitable areas and vacate such sites so that they can be redeveloped with alternative and more appropriate land uses is likely to improve the health of nearby residents.</p> <p>Policies APPLE1 and AAPB4: Proposals to protect and enhance the canalside environment and current cultural and sports facilities such as the Gala Baths and the Leather Museum, is</p>
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		<p>likely to have positive effects on health and wellbeing, as it will ensure that these facilities are accessible to as many Walsall residents as possible by a choice of transport modes including walking and cycling, and will also help to deliver new sports and leisure facilities that the Town Centre currently lacks. It may also increase activity around the canal and encourage its use for cycling and walking.</p> <p>Policies APPLV1 – AAPLV8: Identifying sites for housing, supporting the expansion of Walsall College, encouraging provision of new healthcare facilities and promoting improvements to the environment, including open space, is likely to have positive effects on health and wellbeing, as it will help provide new homes in areas where there is good access to facilities, improve the amenity for existing and future residents, and for those who depend on the Town Centre for shopping, leisure and work, and encourage the use of open spaces and canalside environments for walking and cycling. Proposals to improve links and accessibility to the Manor Hospital will improve access to healthcare facilities, and encouraging uses which support the hospital will also have positive impacts on the healthcare services provided.</p> <p>Policies AAPT1 – AAPT5: Identifying priorities for transport improvements, including improvements to pedestrian links, cycle routes, cycle parking facilities, public transport interchanges, roads, and car parking provision, will help to create a more accessible centre that will serve the community better and improve access by a choice of transport modes.</p>
<p>Negative effects on</p>	<p>Policies IND1 – IND5: There could be localised effects on air quality and noise on some residents in some areas,</p>	<p>Policies AAPB1: and AAP13: There is potential for new development along the Ring Road, including in the Gigaport</p>

<p>health and wellbeing</p>	<p>depending on the type of industrial development. However, there are existing local plan policies in place, 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.</p> <p>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</p> <p>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.</p>	<p>area, to expose those who visit or work in the area to high levels of air pollution. However the AAP looks to mitigate against this through design and also thorough encouraging sustainable modes of transport into and around the centre.</p> <p>Policy AAPLE1: Focusing new leisure development around the Waterfront area could have some negative effects on health and wellbeing if ‘drive-through’ restaurant facilities are proposed which are inaccessible to pedestrians or those using public transport. The policy has sought to mitigate the effects of this by requiring new leisure developments in the Town Centre to be accessible to all, and to create a welcoming and safe environment for everyone.</p>
<p>Potential Risk to Human</p>	<p>There could be localised effects on air quality and noise on some residents in some areas from industry, though</p>	<p>The key potential risk to human health is from air quality through development in areas of exceedence and the increase</p>

Health	this depends on the type of industrial development. They can be mitigated through the operation of 'bad neighbour' policies that impose conditions relating to the operation of industry.	in traffic as a result of more people being attracted to the centre. The AAP looks to mitigate this by ensuring that any impacts from new development on air quality standards are addressed.
Potential Risk to the Environment	The plan essentially carries forward the implementation of a pattern of development that is environmentally sustainable, as it is based on the re-use of brownfield land, and because the location and protection of facilities close to where people live. But there are risks particularly on biodiversity, amenity, landscape, flood risk connected with the restoration of mineral extraction at several sites in the north and east of the Borough.	Further development in the town centre has a number of potential impacts on the environment. The Council is proactive at working with developers and landowners to address such issues and the policy provides information to developers to allow these to be fully considered. Therefore none of the impacts are considered to be significant and the plan looks to mitigate against these and in some cases such as water quality actually implement improvements through ensuring new development improved biodiversity near waterbodies.
Probability/certainty	There are some uncertain effects connected with mineral extraction proposals.	In some cases the potential effects are uncertain, as they depend on factors outside the control of the plan, such as whether planning applications for development will actually come forward in the locations identified for investment, and the effectiveness of existing national policy guidance and local plan policies in preventing harmful effects from any development that does take place. The plan has deliberately developed to have a degree of flexibility to meet market demands whilst giving clear guidance to ensure high quality schemes. This means however that in some cases it's not always possible to identify all the impacts. There is a limit to the extent to which the effects of development can be identified in the SA of a local plan, because some effects can only be determined with confidence at the planning application stage.

<p>Likely Duration/Frequency/Reversibility of Effects</p>	<p>The policies will be in effect until 2026 or until such time as they are replaced by a new local plan. The developments proposed in the SAD and AAP will not be implemented all at the same time, but will be built progressively over the remainder of the plan period. The duration of the effects will also vary according to the type of development and the operations involved. For example, effects from construction and land remediation processes will be temporary, whereas the operational effects of developments once they are built will be mostly permanent and irreversible, although sites may be subject to further redevelopment over the long-term, depending on the future demand for land and development</p>	
<p>Secondary effects</p>	<p>Development on sites already affected by industrial and mining legacy problems) 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.</p> <p>Development in areas vulnerable to flooding 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.</p> <p>Open air waste management operations and mineral extraction operations 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.</p>	<p>The AAP includes policies that look to provide development opportunities for investment which will provide the conditions for improving the range of facilities and services available in the Town Centre, making it more attractive for residents and visitors.</p> <p>Through strengthening the town centre it should result in a reduction in the distance people in Walsall need to travel to shop, to work or for leisure. This could also however lead to congestion and increased air pollution in the centre itself if not effectively managed.</p> <p>Office investment could trigger further investment in retail, leisure and housing as more people work in the centre creating further demand.</p> <p>Social enterprises working in the centre to address the needs of the surrounding community could help address wider social and economic issues in the borough.</p> <p>More housing in the centre may increase demand for services such as GPs</p> <p>Good design can also have a positive impact on energy consumption and climate change mitigation.</p>

		<p>Improved public transport and cycle facilities could result in a reduction in car usage and a reduction in emissions; however the opposite is likely for improved car parking facilities.</p>
<p>Cumulative</p>	<p>The main example of potential cumulative effects of the SAD on the SA Objectives is development of new waste management facilities or quarries in areas where there are already existing operations of a similar nature, which could have further cumulative harmful effects on amenity and transport infrastructure</p>	<p>The key cumulative impact is in regards to congestion and air quality as the town centre attracts further development and investment more people will potentially visit the centre with consequences to climate change and health. The more demand and investment there is in the centre the more potential there will be for schemes such as public transport.</p>
<p>Inter-relationships</p>	<p>Inter-relationships between traffic generation and effects on air quality, amenity and noise, 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;</p> <p>Inter-relationships between effects on biodiversity, landscape, climate change resilience, and effects on soil quality and water quality 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</p> <p>Inter-relationships between effects on biodiversity, ground conditions, townscape quality, soil quality and water quality where development is proposed on sites affected by industrial and mining 'legacy' issues, near to</p>	<p>The key to the relationship between effects is the creation of demand. By attracting investment into the centre, there should be more visitors which in turn acts as a catalyst for further investment. Unfortunately this has some less positive effects such as the increase in traffic and air pollution but the plan provides sufficient mitigation to ensure that in balance the AAP has a positive impact overall.</p>

	<p>inland waterways which are identified as wildlife corridors.</p>	
<p>Effects on standards</p>	<p>The general locations and overall quantity of sites allocated for development or designated for protection in the SAD are aimed at delivering the requirements of the BCCS. However, the BCCS was not generally site-specific: there is potential for development in specific locations on sites allocated in the SAD and AAP to have effects on national or international standards that could not be identified through the high level appraisal carried out for the BCCS. It is also possible that new effects or standards might have been identified or introduced since the BCCS was prepared.</p>	
<p>Trans-boundary</p>	<p>Several large new industrial opportunities that were not in the industrial supply are located close to the boundary with Wolverhampton and Sandwell. It can be expected that residents close to the Walsall boundary will share the employment related benefits;</p> <p>Transport schemes will by their nature have cross boundary effects. The two examples of this are the rapid transit network, connecting Walsall to Wolverhampton and Wednesbury, and the Walsall - Brownhills rail line, which if reinstated could provide cross boundary services to Lichfield in Staffordshire;</p> <p>Potential harmful effects from further mineral extraction in Aldridge (Policies M4 and M5) on local communities, businesses and highway infrastructure in adjoining parts of Lichfield District in Staffordshire, as haulage routes for exported sand and gravel could include roads in Staffordshire.</p> <p>Potential beneficial effects from identifying further sources of sand and gravel and brick clay in Walsall, which may</p>	<p>The proposals within the AAP will provide opportunities for further investment in the strategic centre, including in areas where there is likely to be space for new development and more market demand, enabling Walsall Town Centre to compete more effectively with other strategic centres in the area such as Cannock, Wolverhampton, West Bromwich and Sutton Coldfield.</p>

	<p>reduce the need to import these materials from other areas, in particular, from Staffordshire, which currently supplies more than 60% of the quarried sand and gravel used in the West Midlands Metropolitan Area, and most of the imported clay at Sandown Brickworks;</p> <p>Potential effects from mineral extraction in Brownhills on local communities, businesses and highway infrastructure in adjoining areas of Cannock Chase District in Staffordshire, as coal and fireclay extraction could take place on both sides of the boundary in the Yorks Bridge Area of Search identified in the BCCS and haulage routes for exported coal and fireclay could include roads in Staffordshire;</p> <p>There is the potential for developments within Great Barr Hall and Estate and the former St. Margaret’s Hospital to impact on the setting of designated heritage assets outside the borough boundary as well as leading to increased traffic outside the borough in both Sandwell and Birmingham. These would be mitigated against through the development management process as they are dependent on which locations within the site the development is proposed.</p>	
<p>Mitigation Recommendations</p>	<p>Where potential harmful effects have been identified which would not be addressed through application of existing national policy guidance and local plan policy in the BCCS or UDP, the effects have been mitigated through the relevant SAD Policies, where feasible.</p>	<p>The key mitigation needed to address impacts identified through the SA process is the need to address potential decrease in air quality and to ensure that schemes are designed in a way to limit the impact of air quality in the town centre. This is address throughout the AAP and by a</p>

	<p>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, so that the effects will be evaluated in more detail at the appropriate time, and the measures proposed to prevent, manage and mitigate the effects on the environment, amenity and infrastructure can 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.</p> <p>The effects of mineral developments – and indeed other types of developments - once they have been implemented can be mitigated through the working programme and the working conditions. 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.</p>	<p>specific policy in the document.</p>
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SA Stage Four: Publication - Appraisal of Final Plan

Update on Options

Following the Preferred Option Stage the plans have been reviewed in light of the consultation representations received.

The main SAD options that were identified or modified after the Preferred Option are as follows

- Further options relating to **affordable and special needs housing**. Option 2, including a new policy in the SAD to provide up-to-date guidance on meeting requirements for affordable housing in Walsall.
- Further options dealing with **Gypsies and Traveller Sites**, to provide a reduced requirement that is in accord with a revised accommodation assessment.
- Further options covering **brick clay extraction** (in the Minerals section).
- Further options in relation to mitigating the effect of developments on Cannock Chase SAC

In relation to the AAP there were no further options identified. One option which was rejected at the Preferred Option stage is now the option being proposed in the publication plan. The Preferred Option for community facilities was to allocate for a community hub. However, no consultation responses were received during Preferred Option stage to support this and there is a significant question over the deliverability of such a use. Therefore the option being pursued in the Publication plan is to provide criteria for a community hub and suggest an ideal location rather than allocate a site and risk leaving making the site undeliverable for alternative uses.

Update on Policies

There have been no new or deleted policies in the SAD Draft Plan compared with the Preferred option

Amended Policies

The Draft Plan has some slight substantive amendments to the following policies compared with the Preferred Option (as opposed to grammatical or simple clarifications to the wording):

HC3, HC4

LC5

EN1, EN2, EN4

M1-M9.

SLC1

UW1

W1-W4

T4

Following the Preferred Options consultation a number of minor changes have been made to the wording of AAP policies. No additional policies have been included and none have been removed. Also none of the policy updates have changed the overall SA appraisal results. Where additional parts have been added to policies these have been appraised and included in the detailed AAP appraisal of policies.

SA Stage Five: Submission - Pre-Submission Modification: Appraisal of Proposed Main Modifications

Following consultation between March and May 2016 on the “Publication” draft plan, the Council proposed a number of modifications. These sought to address issues raised during the consultation as well as to update factual information. A full version of the proposed Pre-Submission Main Modifications is available on our website and **Chapter 9** provides a summary of the Main Modifications for both the documents. **Appendix Q** provides a more detailed breakdown of each of the Main Modifications.

None of the Modifications to either the SAD or AAP have been found to have significant harmful effects, which is not surprising as most of them are aimed at improving the clarity of the Publication Draft Policies, addressing anomalies/ inconsistencies, or ensuring that harmful effects of development are addressed.

Most of modifications to the SAD are aimed at ensuring potential harm to future occupiers of sites, in particular from flooding or mineral working, is addressed, either by deleting the proposed allocation of the site for the proposed use or by highlighting the need to take constraints such as flood risk into account in any development. In few cases, the appraisal has resulted in the impact on particular objectives changing from being uncertain to being neutral or positive.

In most cases, the Modifications have not changed the overall SA scoring, but in a few cases the SA scoring has been revised.

- Canals

The Modification was made to reflect the representations received from Natural England (2274). The policy now identifies more clearly the constraints that will need to be addressed should proposals come forward for the Lichfield and Hatherton Canal Restoration Project. The policy identifies the effects which might emerge as a result of proposals for the project to; Cannock Extension Canal SAC, the wider canal network and environment. If the necessary technical work does not support

proposals for the project there is potential support available for the indicative line of the canal to be protected by creating a green corridor or heritage trail.

- **Mineral Infrastructure**

The Modification has addressed an anomaly/ inconsistency in the Publication Draft policy, whereby impacts on infrastructure were not previously taken into account. With the Modification, the policy is now considered to score very positively overall as it now requires impacts on infrastructure (including social infrastructure, renewable and low carbon energy infrastructure, transport infrastructure and water treatment infrastructure) to be effectively managed.

- **Brick Clay Extraction – Stubbers Green**

The modified policy identifies more clearly the constraints that will need to be overcome to demonstrate that further brick clay extraction at Stubbers Green will be acceptable, including the need for effective flood risk management taking into account vulnerability to climate change effects. The proposed Modification will reduce some of the uncertainties about the effects of further mineral development, ensuring that areas at risk from flooding are evaluated early on in the process. This will increase the likelihood that indirect harmful effects on designated nature conservation sites can be prevented, reduced and as fully as possible offset, and that any positive effects that can be achieved will be delivered.

A comparison between the previous overall score of the AAP policies and the scores following modifications has shown that none of the modifications change the results and therefore the overall impact of the policies.

Monitoring

Significant Effects Indicators – SAD

No further monitoring indicators have been identified, as the monitoring indicators identified in the SAD are considered to be sufficient to measure the environmental, economic and social effects of the plan, including any 'significant' harmful effects likely to arise. The potential 'significant' effects of SAD Policies M8 and M9 identified in the SA will be monitored through the following existing indicators:

- **EN1 (BCCS Indicator LOI ENV1)** – Net reduction in the area of designated nature conservation sites through development;
- **M7a (BCCS Indicators LOI MIN3 and LOI MIN5)** – Percentage of applications for brick clay extraction or restoration of former brick clay extraction sites which satisfy the

general requirements and criteria in BCCS Policies MIN3 and MIN5 and the specific requirements in SAD Policies M7 and M8; and

- **M9a (BCCS Indicators LOI MIN4 and LOI MIN5)** – Percentage of applications for opencast coal and fireclay extraction (including applications for new conditions) which satisfy the general requirements and criteria in BCCS Policies MIN4 and MIN5 and specific requirements in SAD Policy M9.

Significant Effects Indicators – AAP

No further monitoring indicators have been identified, as the monitoring indicators identified in the AAP are considered to be sufficient to measure the environmental, economic and social effects of the plan.

Chapter 10 of the SA includes a table that sets out how the monitoring indicators in the SAD and AAP relate to the SA objectives, demonstrating how these can be used to monitor the impact on the plan on these objectives.

Conclusions

The SA process has been crucial in shaping the preferred options and policies that make up the publication version of the SAD. **Chapter 11** of the SA provides some examples of how the SA has influenced the plans making.