

Sustainability Appraisal of the Sandwell Local Plan

Regulation 18: Issues and Options

January 2023



LEPUS CONSULTING
LANDSCAPE, ECOLOGY, PLANNING & URBAN SUSTAINABILITY

Sustainability Appraisal of the Sandwell Local Plan

Regulation 18: Issues and Options

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Sandwell Local Plan and meets the requirements of the SEA Regulations. It is not intended to be a substitute for an Environmental Impact Assessment (EIA) or Appropriate Assessment (AA).

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Acronyms & Abbreviations

| | |
|-----------------------|---|
| A&E | Accident and Emergency |
| ALC | Agricultural Land Classification |
| AQMA | Air Quality Management Area |
| BCCS | Black Country Core Strategy |
| BCP | Black Country Plan |
| BMV | Best and most versatile |
| BNG | Biodiversity Net Gain |
| CfS | Call for Sites |
| DBEIS | Department for Business, Energy and Industrial Strategy |
| DEFRA | Department for Environment, Food and Rural Affairs |
| EDNA | Economic Development Needs Assessment |
| EU | European Union |
| FEMA | Functional Economic Market Area |
| GHG | Greenhouse Gas |
| GI | Green Infrastructure |
| GIS | Geographical Information Systems |
| GP | General Practitioner |
| HRA | Habitats Regulations Assessment |
| IRZ | Impact Risk Zone |
| LNR | Local Nature Reserve |
| LTP | Local Transport Plan |
| MHCLG | Ministry of Housing, Communities and Local Government |
| NHS | National Health Service |
| NNR | National Nature Reserve |
| NO₂ | Nitrogen Dioxide |
| NPPF | National Planning Policy Framework |
| ONS | Office of National Statistics |
| PDL | Previously developed land |
| PPP | Policies Plans and Programmes |
| PRoW | Public Rights of Way |
| RPG | Registered Park and Garden |
| SA | Sustainability Appraisal |
| SAC | Special Area of Conservation |
| SAD | Site Allocation Document |
| SEA | Strategic Environmental Assessment |
| SHLAA | Strategic Housing Land Availability Assessment |
| SLP | Sandwell Local Plan |
| SM | Scheduled Monument |
| SMBC | Sandwell Metropolitan Borough Council |
| SPA | Special Protection Area |
| SPZ | Source Protection Zone |
| SSSI | Sites of Special Scientific Interest |
| SuDS | Sustainable Drainage System |

Executive Summary

About this report

- E1 Lepus Consulting is conducting an appraisal process for Sandwell Metropolitan Borough Council (SMBC) to help them prepare the Sandwell Local Plan (SLP). The appraisal process is known as Sustainability Appraisal (SA) and is prepared during a number of different stages to facilitate iteration between the Plan makers (SMBC) and the appraisal team (Lepus Consulting). The SA process seeks to provide high level environmental protection. The different stages of plan making are mostly accompanied by consultation with statutory bodies, other stakeholders and the public.
- E2 SA is the process of informing and influencing the preparation of a local plan to optimise its sustainability performance. SA considers the social, economic and environmental performance of the plan.
- E3 This report has been prepared and published following preparation of the SA Scoping Report in January 2023, which identified the scope and level of detail to be included in the SA process going forward, including setting out the SA Objectives, which are used to inform the assessment of the likely effects of the SLP at this and future stages of plan making.
- E4 This Regulation 18 SA Report accompanies the SLP Issues and Options Consultation document, which is a high-level document setting out the approach for the SLP process. This SA has been prepared to assess the proposed options for the Vision of the SLP, and the draft SLP Objectives, as presented in the SLP Issues and Options document.
- E5 The SLP Issues and Options document is intended to identify matters where SMBC feels more specific consideration is needed in a Sandwell context, and to get the broad views of local communities and stakeholders on issues of importance to them. It does not set out any policies, sites or reasonable alternatives for consideration and this stage.
- E6 In the future, the SA process will include assessments of further options (or 'reasonable alternatives') as identified by SMBC throughout the plan making process. The assessment of reasonable alternatives is an important requirement of the SEA Regulations.

Summary findings

- E7 Findings from the assessments are presented in a single-line matrix format. The high-level matrix is not a conclusive tool or model. Its main function is to identify at a strategic level whether or not the assessment requires a more detailed examination or whether satisfactory conclusions may be drawn from the high-level assessment without the need for further detailed analysis of a particular proposal.
- E8 At this stage, the assessment has focused on the SLP Vision and Objectives, which set out high-level aspirations for the emerging SLP.

SLP Vision

- E9 SMBC have proposed two options for the SLP Vision within the Issues and Options document; Option A refers to the application of the Sandwell Vision 2030 and accompanying 'ambitions' as set out in the Sandwell Corporate Plan¹ for the emerging SLP, whereas Option B presents new suggested wording for the SLP Vision.
- E10 Both Options A and B have similar aims to deliver safe, healthy and sustainable growth across Sandwell, and as such they both perform well against the SA Framework. Major positive, minor positive and negligible impacts have been identified across the SA Objectives.
- E11 The options perform similarly against the majority of SA Objectives. Both options provide strong aspirations for addressing inequalities, providing improved access to jobs, healthcare, education and local services, and seek to enhance public transport provision across the borough. The options also seek to provide high quality development to meet the needs of the local population, promote social cohesion and rejuvenate Sandwell's towns and centres.
- E12 Overall, Option B has been identified as the best performing of the two. The suggested wording provided under Option B sets out more detail and specificity relating to environmental protection and enhancement, with greater recognition of the benefits of green infrastructure, compared to Option A.
- E13 Furthermore, Option B provides stronger wording in relation to climate change mitigation and adaptation, with reference to carbon reduction, awareness of climate change and more emphasis on active travel.

SLP Objectives

- E14 SMBC have drafted a set of 11 Objectives for the emerging SLP, which together are intended to help the achievement of the proposed vision for Sandwell, forming a framework for the delivery of sustainable growth. No alternative options for the SLP Objectives have been identified.
- E15 The draft SLP Objectives address a range of sustainability issues and seek to conserve and improve the natural and built environment of Sandwell. As such, the Objectives perform well against the SA Framework, with major positive, minor positive and negligible impacts have been identified across the SA Objectives.

¹ Sandwell Metropolitan Borough Council 2021 – 2025. Big Plans for a Great Place: The Sandwell Plan. Available at: https://www.sandwell.gov.uk/download/downloads/id/29963/corporate_plan_-_big_plans_for_a_great_place_for_the_people_of_sandwell.pdf [Date accessed: 16/01/23]

- E16 The SLP Objectives include promotion of development to meet identified needs in sustainable locations which encourage public transport and active travel, as well as improved access to services and jobs, whilst making the best use of available land and helping to regenerate Sandwell's towns and centres.
- E17 The Objectives also seek to adopt a proactive approach to climate change mitigation and adaptation, through encouraging innovative design, carbon reduction measures and incorporation of green infrastructure. The importance of high-quality design and sufficient indoor and outdoor space are also emphasised, which would be expected to benefit health and wellbeing as well as ensuring that development is in keeping with, and where possible enhances, the local character and heritage.
- E18 The Objectives seek to promote the conservation and enhancement of Sandwell's natural environment, biodiversity, landscapes and rich historic environment, alongside providing the necessary growth and investment to support the needs of the growing population.

Recommendations

- E19 **Chapter 4** of this SA Report sets out a range of recommendations for SMBC to consider as the SLP is developed and refined, including recommendations to improve the SLP Vision and Objectives, as well as consideration of the identification, description and evaluation of reasonable alternatives which will be an important aspect of the SA process going forward.

Next steps

- E20 This Regulation 18 Issues and Options SA Report is subject to consultation with statutory consultees, stakeholders and the general public, alongside the SLP Issues and Options document, and the SA Scoping Report.
- E21 This report represents the latest stage of the SA process. The SA process will consider any comments on this report and use them to inform subsequent stages, where appropriate.
- E22 Once SMBC have reviewed Regulation 18 Issues and Options consultation comments and have begun preparing the next version of the SLP (the Draft Plan), preparation of a second Regulation 18 SA Report will begin.
- E23 At the Regulation 19 stage, preparation of an Environmental Report will begin, also known as a full SA report. The Environmental Report will include all the legal requirements set out in Schedule 2 of the SEA Regulations.

1 Introduction

1.1 Background

- 1.1.1 Sandwell Metropolitan Borough Council (SMBC) are in the process of writing the Sandwell Local Plan (SLP). As part of this process, a Sustainability Appraisal (SA) is being undertaken that incorporates the requirements of Strategic Environmental Assessment (SEA). The purpose of SA/SEA is to help guide and influence the decision-making process for SMBC by identifying the likely sustainability effects of reasonable alternatives, options, and proposals.
- 1.1.2 The SLP is at an early stage of preparation, known as 'Issues and Options'. The purpose of this SA report is to assess the sustainable development implications of proposals presented in the Sandwell Local Plan Issues and Options Review consultation document. Subsequent stages of the local plan process will identify more detailed policies and site options.
- 1.1.3 Through the Issues and Options Consultation, the Council are seeking to involve local people, businesses and stakeholders in identifying what the emerging SLP should address. In addition to various questions which seek to gather views from consultees, the Issues and Options document identifies to options for the Vision and 11 draft Objectives for the SLP, which have been assessed in this SA report.
- 1.1.4 SA is a systematic process that must be carried out during the preparation of local plans and spatial development strategies. The SA outputs throughout the plan making process will help SMBC to promote sustainable development by assessing the extent to which the emerging SLP, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives.
- 1.1.5 This SA/SEA document follows on from the SA Scoping Report prepared in January 2023, which has been published for consultation with the statutory bodies (Natural England, Historic England and the Environment Agency) alongside this Regulation 18 Issues and Options SA Report.

1.2 Sandwell Borough

- 1.2.1 Sandwell is a metropolitan borough covering approximately 8,556ha, with a population of 341,900 according to the Census (2021)². On average, Sandwell has a younger and more ethnically diverse population than the rest of the UK. Deprivation and inequalities are key issues for the local population.
- 1.2.2 Sandwell lies within the Black Country, which is a predominantly urban sub-region of the West Midlands. The sub-region also includes the boroughs of Dudley, Walsall and the City of Wolverhampton. The location of Sandwell is shown in **Figure 1.1**.

² Office for National Statistics (2022) How the population changed in Sandwell: Census 2021. Available at: <https://www.ons.gov.uk/visualisations/censuspopulationchange/E08000028/> [Date accessed: 03/01/23]

- 1.2.3 The borough contains the strategic centre of West Bromwich, main towns including Oldbury, Rowley Regis, Smethwick, Tipton and Wednesbury, and several smaller towns and settlements. Sandwell's towns are well connected through a network of strategic transport routes, with links to other regional and national centres via the M5 / M6 and rail corridors.
- 1.2.4 Industry and manufacturing form a key part of Sandwell's history, which continues in the local economy today. The borough also supports a range of parks and open spaces including the Rowley Hills and Sandwell Valley. Sandwell Valley forms Sandwell's only extent of Green Belt land.

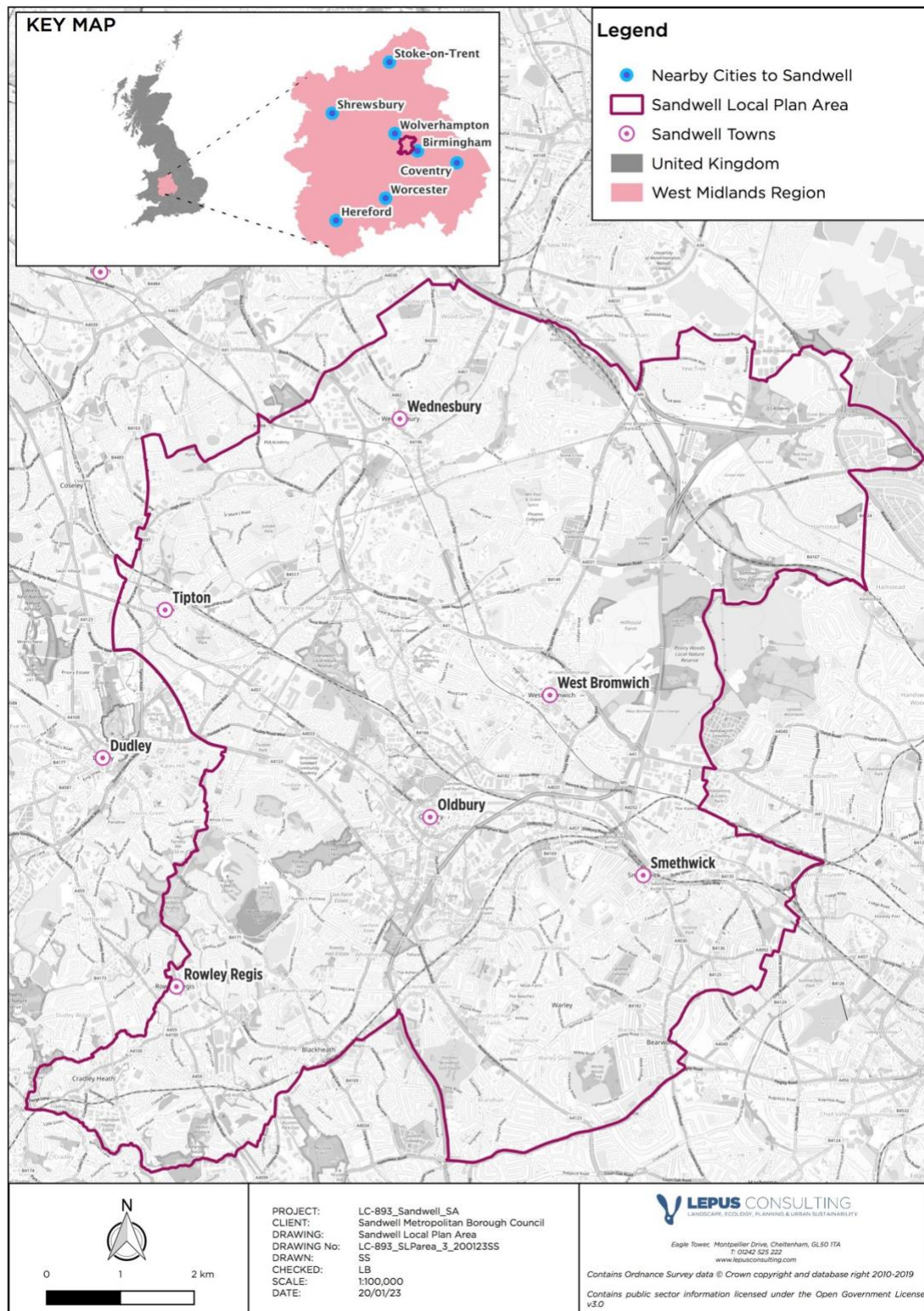


Figure 1.1: Sandwell administrative boundary

1.3 The Sandwell Local Plan

- 1.3.1 The SLP will include the overall strategy for development in Sandwell Metropolitan Borough for the plan period (expected to be until 2041), including a vision for the future, relevant objectives, site allocations and policies.
- 1.3.2 The SLP is being prepared by SMBC, after work ceased on the preparation of the Black Country Plan (BCP) in autumn 2022. The SLP will seek to incorporate strategic policies, adapted from those presented in the draft BCP, to ensure that the SLP provides appropriate guidance at both the strategic and locally specific levels.
- 1.3.3 Once adopted, the SLP will form part of the statutory development plan for the borough covering a minimum of 15 years, replacing and updating the currently adopted Black Country Core Strategy (BCCS)³, Sandwell Site Allocation and Delivery Development Plan Document (SAD)⁴, and various Area Action Plans which cover the period from 2006 to 2026.
- 1.3.4 The SLP Issues and Options document has been prepared by SMBC and is being consulted on alongside this Regulation 18 Issues and Options SA Report, whereby the public will be asked to give their views on the topics and issues the new plan should cover as it progresses.

1.4 Duty to Cooperate

- 1.4.1 The Duty to Cooperate (DtC) was created in the Localism Act 2011⁵ and amends the Planning and Compulsory Purchase Act 2004. It places a legal duty on local planning authorities, county councils in England and public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of local plan preparation in the context of strategic cross boundary matters.
- 1.4.2 A DtC Statement will be prepared, which will demonstrate how SMBC has fulfilled this duty through the plan making process. It is intended to draft and agree Statements of Common Ground with relevant authorities and bodies on key DtC issues at the Publication stage.

1.5 Integrated approach to SA and SEA

- 1.5.1 The requirements to carry out SA and SEA are distinct, although it is possible to satisfy both obligations using a single appraisal process.

³ Black Country Authorities (2011) Black Country Core Strategy. Available at: <https://blackcountryplan.dudley.gov.uk/t1/p2/> [Date accessed: 04/01/23]

⁴ Sandwell Metropolitan Borough Council (2012) Site Allocations and Delivery Development Plan Document. Available at: https://www.sandwell.gov.uk/info/200275/planning_and_buildings/676/site_allocations_and_delivery_development_plan_document [Date accessed: 04/01/23]

⁵ Localism Act 2011. Available at: <https://www.legislation.gov.uk/ukpga/2011/20/contents> [Date accessed: 03/01/23]

- 1.5.2 The European Union Directive 2001/42/EC⁶ (SEA Directive) applies to a wide range of public plans and programmes on land use, energy, waste, agriculture, transport and more (see Article 3(2) of the Directive for other plan or programme types). The objective of the SEA procedure can be summarised as follows:
- 1.5.3 *"the objective of this Directive is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development"*.
- 1.5.4 The SEA Directive has been transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004⁷ (SEA Regulations). Under the requirements of the SEA Directive and SEA Regulations, specific types of plans that set the framework for the future development consent of projects must be subject to an environmental assessment. Therefore, it is a legal requirement for the Local Plan to be subject to SEA throughout its preparation.
- 1.5.5 SA is a UK-specific procedure used to appraise the impacts and effects of development plans. It is a legal requirement as specified by S19(5) of the Planning and Compulsory Purchase Act 2004⁸ and should be an appraisal of the economic, social and environmental sustainability of development plans. The present statutory requirement for SA lies in The Town and Country Planning (Local Planning) (England) Regulations 2012⁹. SA is a systematic process for evaluating the environmental consequences of proposed plans or programmes to ensure environmental issues are fully integrated and addressed at the earliest appropriate stage of decision-making.
- 1.5.6 Public consultation is an important aspect of the integrated SA/SEA process.

1.6 Best Practice Guidance

- 1.6.1 Government policy recommends that both SA and SEA are undertaken under a single sustainability appraisal process, which incorporates the requirements of the SEA Regulations. The approach for carrying out an integrated SA and SEA is based on best practice guidance, including the following:

⁶ Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment (SEA Directive). Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32001L0042&from=EN> [Date accessed: 03/01/23]

⁷ The Environmental Assessment of Plans and Programmes Regulations 2004. Available at: <http://www.legislation.gov.uk/uksi/2004/1633/contents/made> [Date accessed: 03/01/23]

⁸ Planning and Compulsory Purchase Act 2004. Available at: <https://www.legislation.gov.uk/ukpga/2004/5/contents> [Date accessed: 03/01/23]

⁹ The Town and Country Planning Regulations 2012. Available at: <http://www.legislation.gov.uk/uksi/2012/767/contents/made> [Date accessed: 03/01/23]

- European Commission (2004) Implementation of Directive 2001/42 on the assessment of the effects of certain plan and programmes on the environment¹⁰.
- Office of Deputy Prime Minister (2005) A Practical Guide to the SEA Directive¹¹.
- Ministry of Housing, Communities and Local Government (2021) National Planning Policy Framework (NPPF)¹².
- Ministry of Housing, Communities and Local Government (2021) Planning Practice Guidance (PPG)¹³.
- Royal Town Planning Institute (2018) Strategic Environmental Assessment, Improving the effectiveness and efficiency of SEA/SA for land use plans¹⁴.

1.7 Sustainability Appraisal

1.7.1 This document is a component of the SA of the SLP. It provides an assessment of the emerging SLP Vision and Objectives, as per Stage B of **Figure 1.2**, according to PPG on SA¹⁵.

¹⁰ European Commission (2004) Implementation of Directive 2001/42 on the assessment of the effects of certain plan and programmes on the environment. Available at:

http://ec.europa.eu/environment/archives/eia/pdf/030923_sea_guidance.pdf [Date accessed: 03/01/23]

¹¹ Office of Deputy Prime Minister (2005) A Practical Guide to the SEA Directive. Available at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/7657/practicalguides_ea.pdf [Date accessed: 03/01/23]

¹² MHCLG (2021) National Planning Policy Framework. Available at:

<https://www.gov.uk/government/publications/national-planning-policy-framework--2> [Date accessed: 03/01/23]

¹³ DLUHC & MHCLG (2021) Planning practice guidance. Available at:

<https://www.gov.uk/government/collections/planning-practice-guidance> [Date accessed: 03/01/23]

¹⁴ Royal Town Planning Institute (2018) Strategic Environmental Assessment, Improving the effectiveness and efficiency of SEA/SA for land use plans. Available at: <https://www.rtpi.org.uk/media/1822/sea-sapracticeadvicefull2018c.pdf> [Date accessed: 03/01/23]

¹⁵ DLUHC & MHCLG (2020) Guidance: Strategic environmental assessment and sustainability appraisal. Available at:

<https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal> [Date accessed: 03/01/23]



Figure 1.2: Sustainability appraisal process

1.8 The SA process so far

1.8.1 **Table 1.1** below presents a timeline of stages of the SLP and SA process so far. To date, this represents Stages A and B of **Figure 1.2**.

Table 1.1: *The SLP and SA process so far*

| Date | SLP Stage | Sustainability Appraisal |
|------------------------------|--|---|
| January 2023 | Plan making commences. | SA Scoping Report The Scoping Report identifies the scope and level of detail to be included in the SA. |
| February – March 2023 | Issues and Options (Regulation 18) Consultation In the Issues and Options document, the Council considers the ways in which future development needs could be met and asks the public and other stakeholders to comment on these key issues for the borough. | Regulation 18: Issues and Options SA Report This report presents an assessment of the SLP Vision and Objectives presented in the consultation document, and makes recommendations for the emerging SLP. |

1.9 Scoping Report

1.9.1 In order to identify the scope and level of detail of the information to be included in the SA process, an SA Scoping Report¹⁶ was prepared in January 2023.

1.9.2 The SA Scoping Report represents Stage A of the SA process (see **Figure 1.2**), and presents information in relation to:

- Identifying other relevant plans, programmes and environmental protection objectives;
- Collecting baseline information;
- Identifying sustainability problems and key issues;
- Preparing the SA Framework; and
- Consultation arrangements on the scope of SA with the consultation bodies.

1.9.3 The Scoping report will be consulted on between 6th February and 20th March 2023, alongside this Regulation 18 Issues and Options SA, with the statutory bodies comprising Natural England, Historic England and the Environment Agency. Comments received during the consultation will inform the preparation of future SA outputs.

1.9.4 This Regulation 18 Issues and Options SA Report does not replicate baseline and contextual information set out in the SA Scoping Report.

1.9.5 Following the consultation, comments received on the SA Scoping Report and this Regulation 18 Issues and Options SA Report will be carefully considered and used to inform subsequent SA outputs in the SA process. Further consultations and opportunities to comment on the emerging SLP and accompanying SA outputs will occur at each plan making stage.

¹⁶ Lepus Consulting (2023) Sustainability Appraisal of the Sandwell Local Plan: Scoping Report

1.10 Signposting for this report

1.10.1 This Regulation 18 Issues and Options SA Report sets out an assessment of the draft Vision and Objectives of the emerging SLP, as set out in the Sandwell Local Plan Issues and Options Review consultation document prepared by SMBC.

1.10.2 The contents of this SA Report, including the appendix which provides essential contextual information to the main body of the report, are listed below:

- **Chapter 1** (this chapter) sets out the purpose, context and introduction to the SLP and the accompanying SA process.
- **Chapter 2** sets out the assessment methodology and scope of the appraisal.
- **Chapter 3** presents the assessment of the draft Vision and Objectives of the SLP.
- **Chapter 4** sets out a range of recommendations for SMBC to consider as they develop the policies, options and proposals for the emerging SLP.
- **Appendix A** presents the SA Framework.

2 Assessment methodology and scope of appraisal

2.1 Assessment of the SLP Issues and Options

2.1.1 Each of the elements of the SLP appraised in this report have been assessed for their likely impacts on each SA Objective of the SA Framework. The SA Framework, which is presented in its entirety in **Appendix A**, is comprised of 14 SA Objectives. **Table 2.1** summarises the SA Objectives and their relevance to the SEA themes.

Table 2.1: Summary of SA Objectives

| | SA Objectives | Relevance to SEA Regulations – Schedule 2 |
|----|---|---|
| 1 | Cultural heritage: Protect, enhance and manage sites, features and areas of archaeological, historical and cultural heritage importance | Cultural heritage |
| 2 | Landscape: Protect, enhance and manage the character and appearance of the landscape and townscape, maintaining and strengthening local distinctiveness and sense of place | Landscape and cultural heritage |
| 3 | Biodiversity, flora, fauna and geodiversity: Protect, enhance and manage biodiversity and geodiversity. | Biodiversity, flora and fauna |
| 4 | Climate change mitigation: Minimise Sandwell's contribution to climate change. | Climatic factors |
| 5 | Climate change adaptation: Plan for the anticipated levels of climate change. | Climatic factors, soil, water |
| 6 | Natural resources: Protect and conserve natural resources. | Soil, water and material assets |
| 7 | Pollution: Reduce air, soil, water and noise pollution | Air, water, soil and human health |
| 8 | Waste: Reduce waste generation and disposal and achieve the sustainable management of waste. | Population and material assets |
| 9 | Transport and accessibility: Improve the efficiency of transport networks by increasing the proportion of travel by sustainable modes and by promoting policies which reduce the need to travel. | Climatic factors and material assets |
| 10 | Housing: Provide affordable, environmentally sound and good quality housing for all. | Population |
| 11 | Equality: Reduce poverty, crime and social deprivation and secure economic inclusion. | Population and human health |
| 12 | Health: Safeguard and improve community health, safety and wellbeing. | Population and human health |
| 13 | Economy: Develop a dynamic, diverse and knowledge-based economy that excels in innovation with higher value, lower impact activities. | Population and material assets |
| 14 | Education, skills and training: Raise educational attainment and develop and maintain a skilled workforce to support long-term competitiveness. | Population |

- 2.1.2 The SA Framework is comprised of SA Objectives and decision-making criteria. Acting as yardsticks of sustainability performance, the SA Objectives are designed to represent the topics identified in Schedule 2 of the SEA Regulations¹⁷. Including the SEA topics in the SA Objectives helps to ensure that all environmental criteria of the SEA Regulations are represented. Consequently, the SA Objectives reflect all subject areas to ensure that the assessment process is transparent, robust and thorough.
- 2.1.3 It is important to note that the order of SA Objectives in the SA Framework does not infer prioritisation. The SA Objectives are at a strategic level and can potentially be open-ended. In order to focus each objective, decision-making criteria are presented in the SA Framework to be used during the appraisal of policies and sites.
- 2.1.4 The purpose of this document is to provide an appraisal of the proposed SLP Vision and Objectives. At this stage of the plan making process, SMBC have identified two options for the SLP Vision, but have not identified any further reasonable alternatives or options for assessment. Reasonable alternatives will be assessed in subsequent stages of the SA process, in line with Regulation 12 of the SEA Regulations¹⁸:
- 2.1.5 *"Where an environmental assessment is required by any provision of Part 2 of these Regulations, the responsible authority shall prepare, or secure the preparation of, an environmental report ... [which] shall identify, describe and evaluate the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme".*
- 2.1.6 Where applicable, this document also provides information in relation to the likely characteristics of effects, as per the SEA Regulations (see **Box 2.1**). Subsequent stages of the SLP process and accompanying SA process are likely to involve further identification, description and evaluation of reasonable alternatives, including information on the likely characteristics of effects.

¹⁷ Schedule 2 of the SEA Regulations identifies the likely significant effects on the environment, including "issues such as (a) biodiversity, (b) population, (c) human health, (d) fauna, (e) flora, (f) soil, (g) water, (h) air, (i) climatic factors, (j) material assets, (k) cultural heritage including architectural and archaeological heritage, (l) landscape and (m) the interrelationship between the issues referred to in sub-paragraphs (a) to (l)."

¹⁸ The Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations). Available at: <https://www.legislation.gov.uk/uksi/2004/1633/contents/made> [Date accessed: 03/01/23]

Box 2.1: Schedule 1 of the SEA Regulations¹⁹

Criteria for determining the likely significance of effects (Schedule 1 of SEA Regulations)

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

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

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

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

2.2 Impact assessment and determination of significance

2.2.1 Significance of effect is a combination of impact sensitivity and magnitude. Impact sensitivity can be expressed in relative terms, based on the principle that the more sensitive the resource, the greater the magnitude of the change, and as compared with the do-nothing scenario, the greater will be the significance of effect.

2.3 Sensitivity

2.3.1 Sensitivity is measured through consideration of how the receiving environment will be impacted by a plan proposal. This includes assessment of the value and vulnerability of the receiving environment, whether environmental quality standards will be exceeded, and for example, if impacts will affect designated areas or landscapes.

2.3.2 A guide to the range of scales that will be used in determining impact sensitivity is presented in **Table 2.2**. For most receptors, sensitivity increases with geographic scale.

¹⁹ The Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations). Available at: <https://www.legislation.gov.uk/uksi/2004/1633/contents/made> [Date accessed: 03/01/23]

Table 2.2: Impact sensitivity

| Scale | Typical criteria |
|----------------------------|--|
| International/ national | Designations that have an international aspect or consideration of transboundary effects beyond national boundaries. This applies to effects and designations/receptors that have a national or international dimension. |
| Regional | This includes the regional and sub-regional scale, including county-wide level and regional areas. |
| Local | This is the district and neighbourhood scale. |

2.4 Magnitude

2.4.1 Magnitude relates to the degree of change the receptor will experience, including the probability, duration, frequency and reversibility of the impact. Impact magnitude has been determined based on the susceptibility of a receptor to the type of change that will arise, as well as the value of the affected receptor (see **Table 2.3**).

Table 2.3: Impact magnitude

| Impact magnitude | Typical criteria |
|------------------|--|
| High | <ul style="list-style-type: none"> Likely total loss of or major alteration to the receptor in question; Provision of a new receptor/feature; or The impact is permanent and frequent. |
| Medium | Partial loss/alteration/improvement to one or more key features; or The impact is one of the following: <ul style="list-style-type: none"> Frequent and short-term; Frequent and reversible; Long-term (and frequent) and reversible; Long-term and occasional; or Permanent and occasional. |
| Low | Minor loss/alteration/improvement to one or more key features of the receptor; or The impact is one of the following: <ul style="list-style-type: none"> Reversible and short-term; Reversible and occasional; or Short-term and occasional. |

2.5 Significant effects

2.5.1 In this SA Report, a single value from **Table 2.4** has been allocated to each SA Objective for each aspect of the SLP that has been assessed. Justification for the classification of the impact for each SA Objective is presented in an accompanying narrative assessment text for the SLP Vision and Objectives. This approach will be used in the assessment of all aspects of the SLP including all reasonable alternatives and options that will be assessed through the SA process going forward.

- 2.5.2 The assessment of impacts and subsequent evaluation of significant effects is in accordance with Schedule 2 (6) of the SEA Regulations, where feasible, which states that the effects should include: “*short, medium and long-term effects, permanent and temporary effects, positive and negative effects, cumulative and synergistic effects*”.

Table 2.4: Guide to assessing significant effects

| Significance | Definition (not necessarily exhaustive) |
|-----------------------------|---|
| Major Negative -- | <p>The size, nature and location of a development proposal would be likely to:</p> <ul style="list-style-type: none"> • Permanently degrade, diminish or destroy the integrity of a quality receptor, such as a feature of international, national or regional importance; • Cause a very high-quality receptor to be permanently diminished; • Be unable to be entirely mitigated; • Be discordant with the existing setting; and/or • Contribute to a cumulative significant effect. |
| Minor Negative - | <ul style="list-style-type: none"> • The size, nature and location of development proposals would be likely to: • Not quite fit into the existing location or with existing receptor qualities; and/or • Affect undesignated yet recognised local receptors. |
| Negligible 0 | Either no impacts are anticipated, or any impacts are anticipated to be negligible. |
| Uncertain +/- | It is entirely uncertain whether impacts would be positive or adverse. |
| Minor Positive + | <p>The size, nature and location of a development proposal would be likely to:</p> <ul style="list-style-type: none"> • Improve undesignated yet recognised receptor qualities at the local scale; • Fit into, or with, the existing location and existing receptor qualities; and/or • Enable the restoration of valued characteristic features. |
| Major Positive ++ | <p>The size, nature and location of a development proposal would be likely to:</p> <ul style="list-style-type: none"> • Enhance and redefine the location in a positive manner, making a contribution at a national or international scale; • Restore valued receptors which were degraded through previous uses; and/or • Improve one or more key elements/features/characteristics of a receptor with recognised quality such as a specific international, national or regional designation. |

- 2.5.3 When selecting a single value to best represent the sustainability performance, and to understand the significance of effects of an option in terms of the relevant SA Objective, the precautionary principle²⁰ has been used. This is a worst-case scenario approach. If a positive effect is identified in relation to one criterion within the SA Framework (see the decision-making criteria of the SA Framework in **Appendix A**) and a negative effect is identified in relation to another criterion within the same SA Objective, the overall impact has been assigned as negative for that objective. It is therefore essential to appreciate that the impacts are indicative summarily and that the accompanying assessment text provides a fuller explanation of the sustainability performance of the option or proposal being considered.

²⁰ The European Commission describes the precautionary principle as follows: “If a preliminary scientific evaluation shows that there are reasonable grounds for concern that a particular activity might lead to damaging effects on the environment,

- 2.5.4 The assessment considers, on a strategic basis, the degree to which a location can accommodate change without adverse effects on valued or important receptors (identified in the baseline).
- 2.5.5 The level of effect has been categorised as negligible, minor or major. The nature of the significant effect can be either positive or negative depending on the type of development and the design and mitigation measures proposed.
- 2.5.6 In this Regulation 18 Issues and Options SA Report, the proposed SLP Vision and each draft SLP Objective have been assessed for their likely significant effect against each SA Objective in the SA Framework, as per **Table 3.4**. Likely impacts are not intended to be summed.

2.6 Limitations of predicting effects

- 2.6.1 SA/SEA is a tool for predicting potential significant effects. Predicting effects relies on an evidence-based approach and incorporates expert judgement. It is often not possible to state with absolute certainty whether effects will occur, as many impacts are influenced by a range of factors such as the design and the success of mitigation measures.
- 2.6.2 The assessments in this report are based on the best available information, including that provided to Lepus by the Council and information that is publicly available. Every attempt has been made to predict effects as accurately as possible.
- 2.6.3 SA operates at a strategic level which uses available secondary data for the relevant SA Objective. Throughout the SA process, all identified reasonable alternatives, options and proposals will be assessed in the same way using the same method. Sometimes, in the absence of more detailed information, forecasting the potential impacts can require making reasonable assumptions based on the best available data and trends. However, all options must be assessed in the same way and any introduction of site-based detail should be made clear in the SA report as the new data could potentially introduce bias and skew the findings of the assessment process.
- 2.6.4 All data used is secondary data obtained from the Council or freely available on the Internet.

2.7 Methodology for assessment of SLP Vision and Objectives

- 2.7.1 The appraisal of the SLP Vision options and draft SLP Objectives, as presented in the Issues and Options document, aims to assess their likely significant effects, based on the criteria set out in the SEA Regulations (see **Box 2.1**).
- 2.7.2 **Table 2.5** sets out a guide to how likely impacts have been determined in the assessment of options within this report.

or on human, animal or plant health, which would be inconsistent with protection normally afforded to these within the European Community, the Precautionary Principle is triggered”.

Table 2.5: *Presenting likely impacts*

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

- 2.7.3 The appraisal commentary provided should be read alongside the identified impact symbols, as it is often difficult to distill the wide-ranging effects into one overall impact.
- 2.7.4 The appraisal should be read alongside the local context and baseline information set out in the SA Scoping Report.

3 Assessment of the SLP Vision and Objectives

3.1 Preface

- 3.1.1 Local plans should set out a clear vision for the local authority area, which is positive and aspirational but also deliverable. Stemming from the vision, a series of objectives should be established which set out how key issues for the area will be dealt with.
- 3.1.2 Together, the vision and objectives of a local plan should be clear, realistic, locally distinctive and spatial in planning terms, and be based on a sound understanding of the form and function of the plan area²¹.
- 3.1.3 The following assessments seek to evaluate the extent to which the proposed draft objectives and options for the vision for the emerging SLP accord with the SA Framework and will help to guide sustainable development.
- 3.1.4 Recommendations to improve the SLP Vision and Objectives are set out in **Chapter 4**.

3.2 SLP Vision

- 3.2.1 SMBC have proposed two options for the SLP Vision within the Issues and Options document:
- **Option A:** The Sandwell Vision 2030 should be used as the basis of preparing the Local Plan, bearing in mind that it will be for the Local Plan to establish a sustainable strategy for the scale and location for future growth and development.
 - **Option B:** Create a new vision specifically for the Local Plan and the plan period it will cover along the lines of the suggested wording.
- 3.2.2 Option A refers to the application of the Sandwell Vision 2030 and accompanying 'ambitions' as set out in the Sandwell Corporate Plan²² for the emerging SLP. The Sandwell Vision 2030 and ten ambitions are presented in **Box 3.1**.
- 3.2.3 Alternatively, in Option B, SMBC have presented suggested wording for a new Vision for the emerging SLP, with the aim of delivering safe, healthy and sustainable growth across the borough. The suggested wording of the SLP Vision is presented in **Box 3.2**.

²¹ PAS (2014) Good Plan Making Guide, Principle 1: Define a locally relevant spatial vision and objectives for the area. Available at: <https://www.local.gov.uk/sites/default/files/documents/entire-guide-4c0.pdf> [Date accessed: 18/01/23]

²² Sandwell Metropolitan Borough Council 2021 – 2025. Big Plans for a Great Place: The Sandwell Plan. Available at: https://www.sandwell.gov.uk/download/downloads/id/29963/corporate_plan_-_big_plans_for_a_great_place_for_the_people_of_sandwell.pdf [Date accessed: 16/01/23]

Box 3.1: OPTION A – Sandwell Vision 2030, extracted from the Sandwell Corporate Plan 2021 – 2025²³

In 2030, Sandwell is a thriving, optimistic and resilient community.

It's where we call home and where we're proud to belong - where we choose to bring up our families, where we feel safe and cared for, enjoying good health, rewarding work, feeling connected and valued in our neighbourhoods and communities, confident in the future, and benefiting fully from a revitalised West Midlands.

Ambition 1: Sandwell is a community where our families have high aspirations and where we pride ourselves on equality of opportunity and on our adaptability and resilience.

Ambition 2: Sandwell is a place where we live healthy lives and live them for longer, and where those of us who are vulnerable feel respected and cared for.

Ambition 3: Our workforce and young people are skilled and talented, geared up to respond to changing business needs and to win rewarding jobs in a growing economy.

Ambition 4: Our children benefit from the best start in life and a high-quality education throughout their school careers with outstanding support from their teachers and families.

Ambition 5: Our communities are built on mutual respect and taking care of each other, supported by all the agencies that ensure we feel safe and protected in our homes and local neighbourhoods.

Ambition 6: We have excellent and affordable public transport that connects us to all local centres and to jobs in Birmingham, Wolverhampton, the airport and the wider West Midlands.

Ambition 7: We now have many new homes to meet a full range of housing needs in attractive neighbourhoods and close to key transport routes.

Ambition 8: Our distinctive towns and neighbourhoods are successful centres of community life, leisure and entertainment where people increasingly choose to bring up their families.

Ambition 9: Sandwell has become a location of choice for industries of the future where the local economy and high performing companies continue to grow.

Ambition 10: Sandwell now has a national reputation for getting things done, where all local partners are focused on what really matters in people's lives and communities.

Box 3.2: OPTION B – Suggested Vision for the SLP, extracted from the SLP Issues and Options document

In 2041, Sandwell is a thriving, growing and active Borough, leading the urban renaissance of the West Midlands conurbation.

Sandwell is at the forefront of tackling climate change, in its role as a hub for climate adaptation and mitigation technologies and industries. Its new buildings are clean and energy efficient in their design, materials and operations, its old buildings are adapted to deliver low and zero carbon outputs. It sets the standard in both public and private sectors for embedding climate change awareness and sensitivity in all its actions, outcomes and decisions.

Notwithstanding its urban character, Sandwell's residents enjoy access to country and town parks, open spaces, green networks and corridors and increasing numbers of pocket parks, landscaping schemes and tree cover, as part of their everyday activities and leisure time. Sandwell's natural environment is valued for its own sake as well as for its contribution to the health and wellbeing of people living, working, learning in and enjoying the borough.

Sandwell continues to deliver sustained and sustainable economic growth and investment opportunities from its highly accessible location at the heart of the country. It provides high-quality goods and services from its powerful industrial base and levels of employment, wages and economic activity are high and rising.

Sandwell's residents enjoy longer and healthier lives than in previous decades, thanks to the increase in open spaces, the provision of services and facilities designed to promote active recreation and leisure, the improvement of and increased accessibility to healthcare infrastructure and the promotion of healthy lifestyle choices. They have access to well-performing schools, higher and further education provision at all levels and

²³ Sandwell Metropolitan Borough Council 2021 – 2025. Big Plans for a Great Place: The Sandwell Plan. Available at: https://www.sandwell.gov.uk/download/downloads/id/29963/corporate_plan_-_big_plans_for_a_great_place_for_the_people_of_sandwell.pdf [Date accessed: 16/01/23]

Box 3.2: OPTION B – Suggested Vision for the SLP, extracted from the SLP Issues and Options document

to continued opportunities for skills development and training.

There is a wide range of housing available to Sandwell residents, designed to support sustainable living and capable of adaptation to suit all sections of the community. Affordable, social and council houses are available to those who need them. New developments are located within attractively landscaped areas, with access to district and low-cost energy and heating projects, sustainable drainage designed to improve the local environment as well as provide reliable protection against flooding and run-off and all necessary services and facilities within walking distance or a short bus ride away.

Sandwell's town centres thrive by day and by night, with an expanded range of retail, leisure and socialising opportunities as well as acting as the foci for new residential developments, community activities and social enterprises.

- 3.2.4 The proposed options for the SLP Vision have been assessed for their likely sustainability impacts, a summary of which is presented in **Table 3.1**. Explanations and reasonings behind each overall 'score' are set out in the following assessment narrative.

Table 3.1: Impact matrix of options for the SLP Vision

| | SA1 | SA2 | SA3 | SA4 | SA5 | SA6 | SA7 | SA8 | SA9 | SA10 | SA11 | SA12 | SA13 | SA14 |
|-----------------------|-------------------|------------|--------------|---------------|---------------|-------------------|-----------|-------|-----------|---------|----------|--------|---------|-----------|
| Vision | Cultural Heritage | Landscapes | Biodiversity | CC Mitigation | CC Adaptation | Natural Resources | Pollution | Waste | Transport | Housing | Equality | Health | Economy | Education |
| Option A: Vision 2030 | 0 | ++ | 0 | + | + | + | + | 0 | ++ | ++ | ++ | ++ | ++ | ++ |
| Option B: SLP Vision | + | ++ | + | ++ | ++ | + | + | 0 | ++ | ++ | ++ | ++ | ++ | ++ |

Option A: Vision 2030

- 3.2.5 The Sandwell Vision 2030 sets out the aim for Sandwell to be a safe, resilient and healthy borough where the needs of the local population are met, whilst ensuring that future generations are equipped with the skills they need to support sustainable growth.
- 3.2.6 A key focus of the Vision is on health and wellbeing. Under Option A, Sandwell's residents would have good access to healthcare and leisure facilities. The Vision also aims to ensure that health inequalities are addressed, through meeting the needs of vulnerable people, providing a range of appropriate housing, and seeking to increase life expectancy. A major positive impact on health would be expected (SA Objective 12).
- 3.2.7 Option A would help to ensure that the residents of Sandwell have equal opportunities to access work and education. Ambition 3 seeks to develop a highly skilled workforce, and Ambition 4 promotes high quality education. Ambition 9 focuses on promoting innovative industries and boosting the economy. Together, these ambitions would be likely to lead to a major positive impact on the economy and education (SA Objectives 13 and 14).
- 3.2.8 The emphasis on equal opportunities, access to local services and jobs, and promotion of healthy, safe and resilient communities would be likely to lead to a major positive impact on equality (SA Objective 11).

- 3.2.9 The Sandwell Vision 2030 promotes a high standard of public transport that is affordable and provides good connections to local centres as well as employment opportunities further afield. The Vision also states under Ambition 7 that residential growth would be focused close to key transport routes, which would help to reduce journey times, and potentially reduce the need to travel. A major positive impact on transport (SA Objective 9) would be expected with potential for a minor positive impact on climate change mitigation (SA Objective 4) and pollution (SA Objective 7) owing to the associated reduction in transport-related GHG emissions.
- 3.2.10 The Vision promotes "*adaptability and resilience*" within Ambition 1, which could potentially include protection and enhancement of Sandwell's natural resources to ensure that the borough is prepared to deal with the effects of climate change, as well as supporting resilient communities. This may lead to benefits regarding flood resilience, carbon storage and other ecosystem services associated with a resilient natural environment, although these features are not mentioned specifically. A minor positive impact could be achieved with respect to climate change adaptation (SA Objective 5) and natural resources (SA Objective 6).
- 3.2.11 Option A promotes local distinctiveness, which would help to strengthen sense of place. Under Ambition 7, the Vision also promotes attractive neighbourhoods, which may help to encourage the conservation and enhancement of green infrastructure (GI). A more attractive public realm could potentially lead to more walkable neighbourhoods and community interaction, with benefits to the vibrancy of the local area. Improvements to the character and quality of townscapes and landscapes would also be likely. Therefore, a major positive impact on landscape (SA Objective 2) would be expected.
- 3.2.12 The Vision presented under Option A does not directly reference cultural heritage, biodiversity, waste or recycling, and as such, a negligible impact is identified for SA Objectives 1, 3 and 8.

Option B: Suggested wording for SLP

- 3.2.13 The proposed Vision for Sandwell in 2041 within Option B sets out the aspiration to support growth and regeneration for the borough, meeting the needs of the local population and addressing key issues, whilst conserving the natural environment.
- 3.2.14 The Vision seeks to develop Sandwell's role as an industrial hub for the West Midlands by driving climate change adaptation and mitigation technologies, to ensure that the borough plays a key role in tackling climate change whilst striving for economic growth. Sustainable and energy efficient design and construction techniques, and exploration of alternative and low-carbon technologies would also be supported. A major positive impact could be achieved regarding climate change mitigation (SA Objective 4). Through encouraging sustainable economic growth and investment, alongside regeneration and revitalisation of Sandwell's towns, a major positive impact on the economy (SA Objective 13) would also be likely.

- 3.2.15 The Vision encourages the delivery of new developments that are carefully planned to take the effects of climate change into account, including incorporation of sustainable drainage techniques, flood mitigation and adaptation measures, as well as access to district and low-cost energy and heating projects. Recognising the multi-functional benefits of GI, Option B promotes the conservation and enhancement of parks, open spaces, green networks and tree coverage within Sandwell. GI can play a key role in helping urban areas adapt to the effects of climate change, for example through providing protection from extreme weather events, and helping to alleviate the 'urban heat island' effect. Together, these measures would be likely to lead to a major positive impact on climate change adaptation (SA Objective 5).
- 3.2.16 Through encouraging the conservation and enhancement of GI and Sandwell's natural environment, the Vision would be likely to lead to a minor positive impact on biodiversity and natural resources (SA Objectives 3 and 6), through potentially helping to increase the coverage and connectivity of ecological networks and the ecosystem services they provide.
- 3.2.17 Additionally, the emphasis on providing access to a variety of parks and open spaces for new developments would be likely to lead to positive effects on human health. Access to a range of open and green spaces is known to be beneficial for both mental and physical wellbeing, by providing areas for recreation, exercise and reflection. Well designed and attractive neighbourhoods which incorporate GI are likely to encourage people to live more active lifestyles. Furthermore, the Vision promotes the improvement of and increased accessibility to healthcare infrastructure, which would be likely to help address health inequalities. Overall, Option B could lead to a major positive impact on health (SA Objective 12).
- 3.2.18 Pocket parks and other open spaces within urban areas can also provide valuable spaces for community involvement and help to encourage social cohesion. More cohesive and vibrant neighbourhoods would contribute towards improved quality of life and strengthen the sense of local identity. Alongside the proposed improvement of employment and training opportunities, and improved access to amenities, this would be likely to lead to a major positive impact on equality (SA Objective 11).
- 3.2.19 Town centres are proposed to be the focus for new residential and community growth, where existing services are concentrated and there is most potential for new provision. The Vision would help to ensure that residents, workers and visitors within the borough have access to a range of facilities to meet their needs as well as opportunities for leisure and entertainment. In addition to helping revitalise Sandwell's town centres and high streets, this would see benefits to transport and accessibility, through reducing the need to travel and promoting more sustainable travel including walkable neighbourhoods and improved public transport. A major positive impact on transport could be achieved (SA Objective 9), with potential for a minor positive impact on pollution (SA Objective 7) owing to the associated reduction in transport-related emissions.

- 3.2.20 Through rejuvenating townscapes, promoting landscape schemes and increasing the quantity and quality of open spaces and GI, the Vision would be likely to lead to an improvement in the local landscape and townscape character. In combination with the promotion of community facilities, the Vision could potentially help to strengthen sense of place and local identity, with a major positive impact on landscape overall (SA Objective 2).
- 3.2.21 Secondary minor positive effects could occur in relation to the historic environment (SA Objective 1), through seeking to create thriving town centres, as well as the reference to adapting historic buildings to deliver low and zero carbon outputs.
- 3.2.22 Option B seeks to ensure the provision of a range of housing types to meet the diverse needs of the population, including accessible and adaptable homes, affordable homes, and social housing. As such, a major positive impact on housing provision would be likely (SA Objective 10).
- 3.2.23 The Vision seeks to improve access to schools and training opportunities and improve educational attainment. Access to higher and further education provision is also highlighted. Together, these provisions would help to encourage more diversity in opportunities including for life-long learning and support the provision of an appropriately skilled workforce. A major positive impact on education would be likely (SA Objective 14).
- 3.2.24 The Vision presented under Option B does not directly reference waste or recycling, and as such, a negligible impact is identified for SA Objective 8.

Evaluation of options for SLP Vision

- 3.2.25 Whilst both options for the Vision of the SLP perform well against the SA Framework, Option B performs better overall as shown in **Table 3.1**. The suggested wording provided under Option B sets out more detail and specificity relating to environmental protection and enhancement, acknowledging the different valuable aspects of Sandwell's natural environment and with greater recognition of the benefits of GI, compared to Option A.
- 3.2.26 Furthermore, Option B provides stronger wording in relation to climate change mitigation and adaptation, with reference to carbon reduction, energy efficiency, awareness of climate change and more emphasis on active travel and GI.

3.3 SLP Objectives

3.3.1 SMBC have drafted a set of 11 Objectives for the emerging SLP, which together are intended to help the achievement of the proposed vision for Sandwell, forming a framework for the delivery of sustainable growth. No alternative options for the SLP Objectives have been identified. The draft SLP Objectives are presented in **Box 3.3**.

Box 3.3: Draft Objectives for the SLP, extracted from the SLP Issues and Options document

1. Ensure new development takes a proactive approach to climate change mitigation, adaptation and carbon reduction, and that development is resilient to climate change.
2. Deliver sustainable development in locations where people can access jobs and services, delivering wider positive social and economic outcomes and protecting and enhancing local built and natural environments.
3. Address Sandwell's identified and wide-ranging housing needs by supporting the provision of high-quality new homes that are capable of being adapted to meet the future needs of occupiers, provide sufficient internal and external space and promote and support climate change adaptation and mitigation through good design and in the materials and techniques used for their construction.
4. Support regeneration, business investment and job creation to maintain and grow a prosperous and resilient local and regional economy in ways that consider environmental and climate change factors.
5. Support Sandwell's towns and local centres as places for economic, residential and cultural activity with good access to services in ways that protect their heritage, character and identity.
6. Ensure communities in Sandwell are safe and resilient and social cohesion is promoted and enhanced.
7. Require new development to deliver a high standard of design reflecting local character and distinctiveness and that creates greener and safer places that people feel proud to live and work in.
8. Ensure new development and open spaces support health and wellbeing for all, reduce health inequalities and encourage active and healthy lifestyles.
9. Protect and improve Sandwell's environment, including its natural landscapes, green infrastructure and biodiversity, as well as its rich historic built environment.
10. Encourage the effective and prudent use of previously developed land and natural resources, including the efficient use of land and buildings and the use of sustainable and climate-aware construction techniques within new developments, as well as providing for waste management and disposal.
11. Ensure development is supported by essential infrastructure and services and promotes safe movement and more sustainable modes of travel through promoting greener travel networks for walking, cycling and public transport.

3.3.2 Each draft SLP Objective has been assessed for its likely sustainability impacts, a summary of which is presented in **Table 3.2**. Explanations and reasonings behind each overall 'score' are set out in the following assessment narrative.

Table 3.2: Impact matrix of the 11 draft SLP Objectives

| | SA1 | SA2 | SA3 | SA4 | SA5 | SA6 | SA7 | SA8 | SA9 | SA10 | SA11 | SA12 | SA13 | SA14 |
|---------------|-------------------|-----------|--------------|---------------|---------------|-------------------|-----------|-------|-----------|---------|----------|--------|---------|-----------|
| SLP Objective | Cultural Heritage | Landscape | Biodiversity | CC Mitigation | CC Adaptation | Natural Resources | Pollution | Waste | Transport | Housing | Equality | Health | Economy | Education |
| 1 | 0 | 0 | 0 | ++ | ++ | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 2 | + | + | 0 | + | 0 | 0 | + | 0 | ++ | 0 | + | ++ | ++ | ++ |

| SLP Objective | SA1 Cultural Heritage | SA2 Landscape | SA3 Biodiversity | SA4 CC Mitigation | SA5 CC Adaptation | SA6 Natural Resources | SA7 Pollution | SA8 Waste | SA9 Transport | SA10 Housing | SA11 Equality | SA12 Health | SA13 Economy | SA14 Education |
|---------------|--------------------------|------------------|---------------------|----------------------|----------------------|--------------------------|------------------|--------------|------------------|-----------------|------------------|----------------|-----------------|-------------------|
| 3 | 0 | 0 | 0 | + | + | 0 | 0 | 0 | 0 | ++ | + | + | 0 | 0 |
| 4 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | 0 | ++ | 0 |
| 5 | + | + | 0 | 0 | 0 | 0 | 0 | 0 | + | + | + | + | ++ | + |
| 6 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | ++ | + | 0 | 0 |
| 7 | + | ++ | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | + | 0 | 0 |
| 8 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | + | ++ | ++ | 0 | 0 |
| 9 | ++ | ++ | ++ | 0 | + | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 10 | 0 | + | 0 | + | 0 | ++ | + | + | 0 | 0 | 0 | 0 | + | 0 |
| 11 | 0 | 0 | 0 | + | 0 | + | + | + | ++ | 0 | + | + | + | + |

3.3.3 SLP Objective 1 promotes the future proofing of new development to the effects of climate change and supports reducing GHGs. By embedding these principles into the SLP objectives, this demonstrates SMBC's commitment to reducing Sandwell's contributions towards the causes of climate change. A major positive impact on climate change mitigation and adaptation could be achieved (SA Objectives 4 and 5).

3.3.4 SLP Objective 2 seeks to locate development in areas with good accessibility to local services. This is likely to include healthcare facilities, employment opportunities and schools, with major positive impacts anticipated for health, the economy and education (SA Objectives 12, 13 and 14). Through directing growth to accessible locations, the SLP Objective would be likely to reduce the need to travel, resulting in a major positive impact on transport (SA Objective 9) and potentially leading to a minor positive impact on climate change mitigation and air pollution by reducing associated emissions (SA Objectives 4 and 7). By promoting good access for all, a minor positive impact would also be expected for equality (SA Objective 11). SLP Objective 2 also seeks to ensure the protection and enhancement of both the built and natural environment of the local area, with potential secondary minor positive benefits in relation to cultural heritage and landscape (SA Objectives 1 and 2).

- 3.3.5 SLP Objective 3 seeks to address the diverse housing needs for the growing population in Sandwell, with a likely major positive impact on housing provision (SA Objective 10). By providing high quality housing to meet identified needs, including adaptable homes for those with specialist requirements and homes with sufficient internal and external space, this objective would also be expected to lead to a minor positive impact on equality and health (SA Objectives 11 and 12). SLP Objective 3 also supports the incorporation of sustainable construction materials and techniques, with a minor positive benefit likely for climate change adaptation and mitigation (SA Objectives 4 and 5).
- 3.3.6 SLP Objective 4 supports economic growth within Sandwell, to increase the provision of jobs and boost the prosperity of the local economy. Through seeking to maintain a resilient economy and encourage new businesses and regeneration within the SLP area, a major positive impact on the economy would be likely (SA Objective 13). Through increasing the number and variety of jobs in the area, this SLP Objective would be likely to lead to a minor positive impact on access to employment opportunities, with benefits to equality (SA Objective 11).
- 3.3.7 SLP Objective 5 seeks to develop the role of Sandwell's towns and centres as hubs of economic, residential and cultural activities, whilst ensuring the landscape and historic character and identity of the local area are protected. Investing in Sandwell's centres and supporting appropriate growth would be likely to help promote urban regeneration and improve the vibrancy of town centres, with a major positive impact on the local economy (SA Objective 13) and a minor positive impact on landscapes, townscapes and cultural heritage (SA Objectives 1 and 2). Through supporting residential growth in areas with good access to services, potentially including community facilities, healthcare and schools, SLP Objective 5 could also lead to a minor positive impact on transport, housing, equality, health and education (SA Objectives 9, 10, 11, 12 and 14).
- 3.3.8 SLP Objective 6 aims to strengthen Sandwell's communities and improve social cohesion. This is likely to lead to a greater sense of identity for local residents and promote more vibrant communities where people from all backgrounds can feel valued and safe. Therefore, a major positive impact on equality (SA Objective 11) could be achieved, with a secondary minor positive impact on wellbeing (SA Objective 12).
- 3.3.9 SLP Objective 7 promotes high quality design for new development that is in keeping with the local character of the area. Good design that is planned carefully to consider its surroundings would be likely to strengthen local distinctiveness and sense of place. A major positive impact would be likely in terms of the local landscape and townscape character (SA Objective 2). A minor positive impact could also occur in relation to cultural heritage (SA Objective 1), where historic landscapes and buildings form a key part of the local character. Furthermore, through seeking to create a high standard of design with greener and safer neighbourhoods, SLP Objective 7 would also be expected to secure benefits in terms of equality and wellbeing of local residents (SA Objectives 11 and 12).

- 3.3.10 SLP Objective 8 recognises the importance of open spaces and carefully planned new development which aims to improve the quality of life for all Sandwell's residents. Through seeking to address health inequalities and improve access to open spaces, with potential to provide outdoor space for exercise and leisure, a major positive impact would be likely in terms of equality (SA Objective 11) and health and wellbeing (SA Objective 12). Providing high quality developments with sufficient open space could also lead to benefits for housing provision (SA Objective 10). The focus on encouraging active and healthy lifestyles could potentially also lead to improvements to the active travel network, with a minor positive impact on transport anticipated (SA Objective 9).
- 3.3.11 SLP Objective 9 aims to conserve and enhance the natural and built environment of Sandwell. Natural environments include designated habitats, landscapes and GI. By protecting and enhancing natural features including habitats and ecological networks, a major positive impact on biodiversity would be likely (SA Objective 3). GI provides a range of ecosystem services, including helping urban areas to adapt to climate change, for example through providing protection from extreme weather events, and helping to alleviate the 'urban heat island' effect. As such, conserving and enhancing GI would be expected to lead to a minor positive impact on climate change adaptation and natural resources (SA Objectives 5 and 6). By conserving and enhancing built environments, benefits could also be seen through SLP Objective 9 in terms of enhancing the quality and character of local landscapes and townscape, and in particular Sandwell's historic environment including cultural heritage designations and locally important features. A major positive impact on landscape and cultural heritage would be expected (SA Objectives 2 and 3).
- 3.3.12 SLP Objective 10 promotes an efficient use of land and seeks to ensure that the SLP focuses development on previously developed land where appropriate, in accordance with the NPPF. A major positive impact on natural resources (SA Objective 6) could be achieved. SLP Objective 10 is likely to also encourage appropriate re-use or intensification of under-utilised land, which may help to stimulate urban regeneration, with potential minor positive benefits to townscape and the economy (SA Objectives 2 and 13). Benefits for pollution (SA Objective 7), waste (SA Objective 8) and climate change mitigation (SA Objective 4) could also be achieved, through the potential for remediation of contaminated brownfield land for development as well as the intention to support sustainable waste management and construction techniques.

- 3.3.13 SLP Objective 11 seeks to ensure that new development proposed through the SLP is supported by essential infrastructure and services, with a particular focus on transport infrastructure. The SLP Objective supports green travel networks which encourage walking, cycling and public transport, which would be likely to facilitate a modal shift away from private car use. A major positive impact on transport and accessibility would be likely (SA Objective 9), with a minor positive impact on climate change mitigation (SA Objective 4) and pollution (SA Objective 7) owing to the associated reduction in transport-related emissions including GHGs. By encouraging active travel, SLP Objective 11 could also lead to benefits in terms of health and wellbeing (SA Objective 12). By providing essential infrastructure, this is expected to ensure provision of appropriate connections to utilities such as water and sewerage, with a minor positive effect likely for natural resources and waste (SA Objectives 6 and 8). Benefits could also be secured in terms of access to social infrastructure such as community facilities, healthcare, jobs and schools, with minor positive impacts anticipated (SA Objectives 11, 12, 13 and 14).

4 Recommendations

4.1 Overview

- 4.1.1 The SLP Issues and Options document is intended to identify matters where SMBC feels more specific consideration is needed in a Sandwell context, and to get the broad views of local communities and stakeholders on issues of importance to them. It does not set out any policies, sites or reasonable alternatives for consideration and this stage.
- 4.1.2 With this in mind, this chapter of the SA sets out a range of recommendations for SMBC to consider as the SLP continues to be developed and refined, including consideration of the identification, description and evaluation of reasonable alternatives which will be an important aspect of the SA process going forward.
- 4.1.3 **Section 4.2** sets out some recommendations for enhancement of the SLP Vision and Objectives, following on from the assessments presented in **Chapter 3**.
- 4.1.4 **Section 4.3** and **Table 4.1** presents a range of recommendations and commentary on the issues and questions as presented in the SLP Issues and Options document, including recommendations for SMBC to consider in the development of policies for the SLP.

4.2 Recommendations for the SLP Vision and Objectives

- 4.2.1 As set out in **Chapter 3**, the Vision options and the draft Objectives perform well when considered against the SA Framework, with major positive, minor positive or negligible impacts identified across all SA Objectives. However, the following recommendations have been identified to further improve the sustainability of the Vision and Objectives for the SLP:

- The SLP Vision and Objectives could be enhanced through incorporating stronger reference to the importance of conservation and enhancement of cultural heritage and the historic environment, such as seeking opportunities for heritage-led regeneration.
- The SLP Vision and Objectives could be strengthened through including wording to promote nature recovery and delivering measurable net gains in biodiversity alongside residential and economic growth.
- The SLP Vision would benefit from stronger reference to the importance of active travel networks in encouraging healthy lifestyles and addressing climate change and air quality impacts associated with road transport.
- The SLP Vision does not directly reference waste or recycling, although waste management is referred to within SLP Objective 10. Wording could be incorporated to recognise the role that the SLP can play in helping to minimise waste generation and promoting the recycling or re-use of materials during construction and occupation of development.
- Although the conservation of natural environments and importance of GI are highlighted through the SLP Vision and Objectives, it is suggested that wording could be included to recognise the importance of conserving and

improving air and water quality for both human and ecosystem health. Air pollution in particular is a key issue for Sandwell.

4.3 General recommendations for the SLP

- 4.3.1 **Table 4.1** sets out commentary and a range of recommendations for SMBC to consider in the preparation of the SLP, in accordance with the topics and questions as set out in the SLP Issues and Options document.
- 4.3.2 This includes suggestions for policy provisions, supporting evidence, as well as general points for consideration. The recommendations set out are not exhaustive; further recommendations will be made throughout the SA process to help inform the SLP in its preparation.

Table 4.1: SA commentary and recommendations for the SLP Issues and Options

| SLP Issues and Options Topics | SLP Issues and Options Questions | SA Commentary and Recommendations |
|-------------------------------|---|---|
| Tackling climate change | <ul style="list-style-type: none"> ◇ Climate change ◇ Heat networks ◇ Resilient landscapes ◇ Sustainable drainage | <ul style="list-style-type: none"> Wherever possible, the SLP should seek to promote and encourage the generation and use of renewable and low-carbon energy and associated infrastructure. SMBC should provide a positive strategy to achieve this, whilst also ensuring that any adverse impacts, including cumulative impacts, of potential energy schemes are addressed. Different approaches to heat decarbonisation and the removal of gas boilers (as advocated under the Future Homes Standard²⁴), should be promoted through the SLP including consideration of district heating network connections and / or heat pumps. Opportunities to promote Passivhaus buildings²⁵ should be considered. The SLP should incorporate measures to avoid overheating in homes, particularly in urban and higher density developments. Consideration should be given to retrofitting of existing building stock, including energy efficiency upgrades to historic buildings. The SLP should work towards ensuring that all new residential and commercial developments support the move to zero carbon. The effects of regional climate change projections (e.g. Met Office UKCP projections²⁶) on cross cutting themes such as flood risk, biodiversity, air quality, landscape, heritage and mobilisation of contaminants should be taken into consideration in terms of the inter-relationship of effects and the requirement to assess climate change adaptability of developments. As part of additional supporting evidence for the SLP, SMBC could consider commissioning a climate change study and calculating / reporting on GHG emissions in greater detail. This could include use of the Greenhouse Gas Accounting Tool²⁷. More detailed carbon footprint data for the plan area would enable the SA process to evaluate changes to carbon emissions as a consequence of the plan in terms of (a) evolution of the baseline without the plan, and (b) effect on climate change through increased or decreased emissions, with the plan. |

²⁴ Available at: <https://www.gov.uk/government/consultations/the-future-homes-standard-changes-to-part-l-and-part-f-of-the-building-regulations-for-new-dwellings> [Date accessed: 20/01/23]

²⁵ Passivhaus Trust. Available at: <https://www.passivhaustrust.org.uk/> [Date accessed: 25/01/23]

²⁶ Met Office UK Climate Projections (UKCP). Available at: <https://www.metoffice.gov.uk/research/approach/collaboration/ukcp> [Date accessed: 20/01/23]

²⁷ Local Partnerships (2023) Greenhouse Gas Accounting Tool and Waste Emissions Calculator. Available at: <https://localpartnerships.org.uk/greenhouse-gas-accounting-tool/> [Date accessed: 25/01/23]

| SLP Issues and Options Topics | SLP Issues and Options Questions | SA Commentary and Recommendations |
|--|--|---|
| Development strategy and housing provision | <ul style="list-style-type: none"> ◇ Future development in Sandwell ◇ Housing windfall sites ◇ Sustainable locations ◇ Masterplanning ◇ Good design ◇ Shopfront design | <ul style="list-style-type: none"> • Reasonable alternatives should be identified which can be evaluated in the SA process, including: <ul style="list-style-type: none"> ○ Options for the quantity of development to be delivered through the SLP. This can include consideration of overall dwelling numbers, employment floorspace and / or retail provision. ○ Spatial options to consider how the overall level of housing / employment floorspace will be distributed across the area. This can include different models for growth or follow specific thematic priorities. ○ Development sites, informed by the Call for Sites and strategic reviews of housing and employment land availability. • The SLP should support the efficient use of land, seeking appropriate opportunities to remediate degraded or contaminated land, and allocate new development on under-utilised or vacant land. • High density development can play a role in making the best use of available land, particularly in highly urbanised authorities. However, such developments will require careful co-ordination and planning to ensure that potential adverse effects are identified and avoided, for example on townscape character, capacity of local services and transport networks, loss of open spaces, urban heat island effects and 'canyoning' resulting from changing wind patterns. • The SLP should ensure development proposals are constructed in accordance with appropriate design guides and codes, including the 'Design: process and tools'²⁸ government guidance. Implementing locally specific guidance is recommended to support local distinctiveness and tailor the approach to reflect local priorities. • In considering design aspirations, the principles of the 2020 'Building Better, Building Beautiful' report²⁹ should be embraced. There are three pillars to the approach advocated in this report: <i>"ask for beauty, refuse ugliness and promote stewardship"</i>. |
| Other housing issues | <ul style="list-style-type: none"> ◇ Self- and custom-build housing ◇ Specific housing requirements ◇ Gypsies, Travellers and Travelling Showpeople ◇ Houses in multiple occupation | <ul style="list-style-type: none"> • Self- and custom-build housing should be encouraged through the SLP to meet local demands, providing opportunities for design innovation and originality; however, the SLP should also ensure that housing projects are permitted only where they respect the setting and character of the local area. • The SLP should ensure housing provision of different types, including accommodation for Gypsies, Traveller and Travelling Showpeople, reflects the latest evidenced needs and demands of the local population. Wherever possible, and at the earliest opportunity, Gypsy and Traveller communities should be consulted with to identify key issues that can be addressed. |

²⁸ DLUHC & MHCLG (2019) Guidance. Design: process and tools. Available at: <https://www.gov.uk/guidance/design> [Date accessed: 20/01/23]

²⁹ MHCLG (2020) Living with Beauty: Promoting health, well-being and sustainable growth: The report of the Building Better, Building Beautiful Commission. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/861832/Living_with_beauty_BBBBC_report.pdf [Date accessed: 20/01/23]

| SLP Issues and Options Topics | SLP Issues and Options Questions | SA Commentary and Recommendations |
|--------------------------------|---|---|
| | | <ul style="list-style-type: none"> The SLP policies should ensure proposed sites for Gypsies, Travellers and Travelling Showpeople seek to provide suitable access to local services, healthcare and schools to facilitate sustainable development and integration with the community. This could include measures such as developing travel plans to improve public transport connections. The layout and design of new sites should be carefully considered with reference to good practice guidance³⁰. The SLP should ensure development proposals provide adequate indoor space in line with, or wherever possible beyond, the requirements set out in the technical housing standards³¹. Residential development proposals should incorporate functional private or communal open space, including green space. |
| Healthy people and communities | <ul style="list-style-type: none"> ◇ Development for health ◇ Active recreation ◇ Community facilities and services ◇ Green and blue infrastructure ◇ Open space ◇ Hot food takeaways and gambling establishments | <ul style="list-style-type: none"> Wherever possible and deliverable, the SLP should seek to increase the quality and quantity of green and blue infrastructure within Sandwell to provide multi-functional benefits including improved carbon storage, urban cooling, natural flood resilience/flood water storage, opportunities for food production, and provide a more attractive public realm to encourage active travel. This could include cross consideration of the 'Building with Nature' standards³² or similar schemes. Developers, residents, landowners and managers of open spaces should be encouraged to adopt a cooperative approach that connects buildings, gardens and public spaces to create a vibrant and diverse network of interconnected species and habitats. Such a network would enhance the quality of life for local residents as well providing benefits to flora and fauna in the Sandwell area. Improving connectivity of active travel routes should be a priority, owing to the severance of many routes due to the landscape / townscape being dominated by the highway networks discouraging use. SMBC should help to establish better management and maintenance of green spaces and support local involvement, where possible through SLP policies, to reduce anti-social behaviour which may discourage use of open spaces by the local community. SLP policies should ensure development proposals take into consideration the findings of the latest relevant Playing Pitch or Sports Strategies. |

³⁰ Communities and Local Government (2008) Designing Gypsy and Traveller Sites: Good Practice Guide. Available at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/11439/designinggypsiesites.pdf [Date accessed: 25/01/23]

³¹ MHCLG (2015) Technical housing standards – nationally described space standards. Available at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/524531/160519_Nationally_Described_Space_Standard____Final_Web_version.pdf [Date accessed: 20/01/23]

³² Building With Nature. Available at: <https://www.buildingwithnature.org.uk/> [Date accessed: 25/01/23]

| SLP Issues and Options Topics | SLP Issues and Options Questions | SA Commentary and Recommendations |
|-------------------------------|--|--|
| | | <ul style="list-style-type: none"> Setting out criteria to help manage and regulate the number and location of hot food takeaways would help to ensure that adverse impacts on the vitality, amenity and character of Sandwell's centres are avoided, whilst also helping to promote healthier lifestyles. Ensure the provision of local services and community facilities where there is an identified need in the local area. Where appropriate, consider the option for community ownership of some facilities and services. The SLP should recognise the health implications of air pollution and embed the priorities of the Air Quality Action Plan³³ into planning policies seeking to improve air quality. The SLP should strive to minimise the exposure of residents, and particularly vulnerable groups, to existing sources of air pollution through careful consideration of the location, design and configuration of new developments and particularly those close to roads³⁴. |
| Thriving towns | <ul style="list-style-type: none"> ◊ Retailing in town centres ◊ Gateway sites ◊ Town centres | <ul style="list-style-type: none"> The SLP policies should encourage active frontages within town centres and high streets. Improvements to GI coverage within urban areas should also be encouraged, such as through seeking opportunities to design GI into frontages or implement public realm landscaping schemes. This would provide opportunities to improve the quality, character and appearance of built form, promoting a strong sense of place and encouraging visitors. Residential uses in town centres such as above retail areas should be promoted where appropriate, to help reduce the quantity of new land required to meet housing demands and make more efficient use of space. This would also help to ensure that residential development is situated in closer proximity to existing services and facilities to meet day to day needs, reducing the need to travel. Encouraging a varied retail offering and diverse usage in town centres, including residential developments, would be expected to have benefits for sustainability in terms of accessibility to shops, services and jobs, as well as benefits to economic stimulation and regeneration where an increased footfall could positively affect the local economy and employment. |

³³ Sandwell Metropolitan Borough Council (2020) Air Quality Action Plan 2020-2025. Available at: https://www.sandwell.gov.uk/downloads/file/30801/aqap_2020-2025 [Date accessed: 04/01/23]

³⁴ National Institute for Health and Care Excellence (2017) Air pollution: outdoor air quality and health. Available at: <https://www.nice.org.uk/guidance/ng70/chapter/recommendations> [Date accessed: 25/01/23]

| SLP Issues and Options Topics | SLP Issues and Options Questions | SA Commentary and Recommendations |
|----------------------------------|---|--|
| | | <ul style="list-style-type: none"> Development proposals for town centres should carefully consider up to date information and trends regarding the local and regional demand for different types of floorspace, especially following the COVID-19 pandemic, the increase in online shopping and changed perception of town centres³⁵³⁶. The SLP should ensure development proposals, particularly in dense areas such as town centres, promote a safe and accessible neighbourhood, helping to reduce crime and the fear of crime. Consider supporting the use of the 'Secured by Design'³⁷ scheme in relation to crime prevention. |
| West Bromwich | <ul style="list-style-type: none"> West Bromwich West Bromwich future uses | <ul style="list-style-type: none"> The SLP should set out a clear role and strategy for West Bromwich as the largest centre in Sandwell, cross-referencing to the masterplan for West Bromwich centre³⁸ and Interim Planning Statement (IPS)³⁹. |
| Supporting a sustainable economy | <ul style="list-style-type: none"> Employment land need Sandwell's economy Regeneration Demand for employment sites Non-conforming employment uses Alternative uses in industrial areas Training and recruitment | <ul style="list-style-type: none"> Regeneration strategies should address issues associated with urbanisation, including resilience to climate change. The SLP should promote innovative re-use of existing building stocks, including developments which would improve the energy efficiency of historic buildings and take into account their embodied carbon value when considering their retention and re-use, versus their replacement. SMBC should refer to Historic England's guidance on keeping historic buildings in good repair⁴⁰. Changing land uses can help to rejuvenate and modernise landscapes and townscapes and should be supported so long as the design, layout and architecture embraces the existing public realm especially when this includes iconic post-industrial landmarks and distinctive buildings. The SLP policies should recognise the value and significance of heritage assets and their settings and seek to protect and enhance these where possible. |

³⁵ Local Government Association (2021) The Future of High Streets and Town Centres: Trends Analysis/. Available at:

<https://www.local.gov.uk/sites/default/files/documents/The%20future%20of%20high%20streets%20and%20town%20centres%20-%20trends%20analysis.pdf> [Date accessed: 20/01/23]

³⁶ DLUHC & MHCLG (2021) Build Back Better High Streets. Available at: <https://www.gov.uk/government/publications/build-back-better-high-streets> [Date accessed: 20/01/23]

³⁷ Secured by Design. Available at: <https://www.securedbydesign.com/> [Date accessed: 20/01/23]

³⁸ Sandwell Metropolitan Borough Council (2021) West Bromwich Town Centre Masterplan. Available at: https://www.sandwell.gov.uk/downloads/file/32496/west_bromwich_masterplan [Date accessed: 20/01/23]

³⁹ Sandwell Metropolitan Borough Council (2022) West Bromwich Interim Planning Statement. Available at: https://www.sandwell.gov.uk/downloads/download/2798/west_bromwich_interim_planning_statement [Date accessed: 20/01/23]

⁴⁰ Historic England (2023) Stopping the Rot: A guide to enforcement action to save historic buildings. Available at: <https://historicengland.org.uk/images-books/publications/stoppingtherot/> [Date accessed: 25/01/23]

| SLP Issues and Options Topics | SLP Issues and Options Questions | SA Commentary and Recommendations |
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| | | <ul style="list-style-type: none"> Opportunities should be explored in the SLP policies to achieve smart economic growth. This could be encouraged through the use of technology and innovative ways of working to increase productivity without damaging people's quality of life or the environment. Ensure development proposals for employment-led use cumulatively meet the identified employment needs of the Plan area. This should be in accordance with the latest Economic Development Needs Assessment (EDNA), and subsequent reviews. |
| Industrial legacy | ◇ Industrial legacy | <ul style="list-style-type: none"> Whilst it is important that an efficient use of land is promoted and that the SLP supports urban regeneration, the SLP should also ensure development proposals on contaminated land are only permitted where it can be demonstrated that the contamination can be effectively managed or remediated so that it is appropriate for the proposed use. SLP policies should seek to ensure development proposals are designed in order to avoid any significant adverse impacts from pollution, including cumulative impacts, on human health and wellbeing, biodiversity, the effective operation of neighbouring land uses and the water environment. |
| Waste management | ◇ Strategic waste management ◇ Protection and location of waste facilities | <ul style="list-style-type: none"> The SLP should take into account the findings of the Black Country Waste Study⁴¹ and other relevant evidence base documents to ensure that waste management and recovery facilities are appropriately located, and will facilitate moving waste up the hierarchy to enable communities to take more responsibility for waste arising in their areas. Waste strategies and policies will need to take into account predicted increases in waste as well as the need to manage potentially more diverse waste outputs associated with a range of industrial, commercial and technological growth promoted through the SLP and nationally. The SLP policies should require development proposals to demonstrate measures taken to minimise waste generation during construction. To improve efficiency of waste management during occupation of development, proposals should be encouraged to integrate well-designated waste storage space to facilitate effective waste storage, recycling and composting. |
| Greener infrastructure | ◇ General infrastructure ◇ Transport infrastructure ◇ Greener travel networks ◇ Safe access and addressing transport impacts | <ul style="list-style-type: none"> A significant modal shift is required to support more sustainable modes of travel. The SLP should seek opportunities to promote cycling, walking and public transport through consideration of transport infrastructure including the potential for reallocation of road space. Development patterns and layouts should be designed to prioritise access on foot, bicycle and public transport, rather than by car, as advocated |

⁴¹ Wood (2020) Black Country Waste Study – Review of the Evidence Base for Waste to support Preparation of the Black Country Plan Revised Final Report. Available at: https://blackcountryplan.dudley.gov.uk/media/15811/black-country-waste-study-final-report_redacted.pdf [Date accessed: 11/01/23]

| SLP Issues and Options Topics | SLP Issues and Options Questions | SA Commentary and Recommendations |
|-------------------------------|---|---|
| | <ul style="list-style-type: none"> ◇ Communications and digital infrastructure ◇ Telephone kiosks ◇ Broadband ◇ Taxis and private hire vehicles | <p>in Sport England's Active Design guidance⁴². SMBC should consider the recommendations for walkable neighbourhoods as advocated in Sustrans guidance⁴³, and incorporate the findings of the Black Country accessibility modelling exercise carried out as part of the draft BCP evidence base⁴⁴, to help inform the most sustainable locations for new development.</p> <ul style="list-style-type: none"> • The SLP should take into consideration the findings and aims of the emerging Local Transport Plan for the West Midlands. • Where new active travel links are to be provided, these should be well designed so vulnerable groups can travel in confidence; this could include consideration of lighting schemes, overlooking and appropriate vegetation to avoid concealed spaces. Opportunities should be sought to accompany new links with shared spaces such as parks and play areas, with consideration of the potential to conserve or enhance wildlife corridors alongside this. The creation of safe walkable routes is especially important for children to encourage walking to school. • Planning policies should recognise the multi-functional benefits of GI including for wildlife, recreation, flood risk mitigation, urban cooling / shading and carbon storage and seek to incorporate GI features alongside 'grey infrastructure' wherever possible. • Electric vehicle charging networks should be supported including improved distribution and quantity of charging points and public transport options across the SLP area, recognising the crucial role that local authorities play in enabling the transition to electric vehicles⁴⁵. • The SLP should support opportunities for more sustainable and less road-based movement of freight and logistics to help relieve congestion and air quality impacts, including rail and waterways as well as embracing new technologies. |

⁴² Sport England (2015) Active Design Guidance: Planning for health and wellbeing through sport and physical activity. Available at: <https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/active-design#activedesign-19603> [Date accessed: 23/01/23]

⁴³ Sustrans (2022) Walkable neighbourhoods: Building in the right places to reduce car dependency. Available at: <https://www.sustrans.org.uk/our-blog/research/all-themes/all/walkable-neighbourhoods-building-in-the-right-places-to-reduce-car-dependency> [Date accessed: 25/01/23]

⁴⁴ Access Time by Walking or Public Transport to Key Residential Services, page 25, Black Country Plan Site Assessment Report: Assessment and Selection Methodology and Results. Available at: <https://blackcountryplan.dudley.gov.uk/t2/p4/t2p4/> [Date accessed: 30/01/23]

⁴⁵ Office for Zero Emission Vehicles (2022) On-Street Residential Chargepoint Scheme. Available at: <https://www.gov.uk/government/publications/grants-for-local-authorities-to-provide-residential-on-street-chargepoints/grants-to-provide-residential-on-street-chargepoints-for-plug-in-electric-vehicles-guidance-for-local-authorities> [Date accessed: 25/01/23]

| SLP Issues and Options Topics | SLP Issues and Options Questions | SA Commentary and Recommendations |
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| | | <ul style="list-style-type: none"> Opportunities to increase the provision and coverage of high-speed broadband should be encouraged, including fibre to new housing. This would help to ensure new homes support opportunities for home working and learning whilst also contributing towards a reduced need to travel. |
| Enhancing the natural and built environment | <ul style="list-style-type: none"> ◇ Biodiversity net gain ◇ Green spaces ◇ The Rowley Hills ◇ Heritage assets ◇ Conservation areas ◇ Archaeology ◇ Black Country Geopark | <ul style="list-style-type: none"> The SLP should seek opportunities to improve the resilience of the ecological network through increased quantity of habitat and enhanced connectivity, based on an evidenced landscape-scale approach. This could include preparation of an ecological network map or cross referencing to the evidence provided in the emerging Black Country Nature Recovery Network⁴⁶. To supplement emerging SLP policies regarding GI, SMBC could consider commissioning a GI Strategy, with potential to incorporate the principles of Natural England's emerging GI Framework⁴⁷. SMBC should consider using policy tools to set out the quantitative and qualitative requirements for informal / natural green space / GI in new developments, for example, using Natural England's Accessible Natural Greenspace Standard⁴⁸. The findings and recommendations of the emerging HRA of the SLP should be taken into account and incorporated into the SLP policies. The SLP should acknowledge links to biodiversity assets beyond the plan area, including hydrological connections and the potential for likely significant effects on the Severn and Humber estuaries and the species they support. Mandatory 10% BNG is expected to come into force for Town and Country Planning Act developments in November 2023, although the SLP could strive to achieve higher BNG targets, for example in strategic developments. SMBC could consider implementing an Environmental Net Gain policy which would require developers to deliver a wider range of environmental benefits than BNG alone, such as for air quality and flood risk management^{49 50}. |

⁴⁶ Birmingham and Black Country Wildlife Trust: Nature Recovery Network. Available at: <https://www.bbcwildlife.org.uk/NatureRecoveryNetwork> [Date accessed: 20/01/23]

⁴⁷ Natural England (2023) Introduction to the Green Infrastructure Framework – Principles and Standards for England. Available at: <https://designatedsites.naturalengland.org.uk/GreenInfrastructure/Home.aspx> [Date accessed: 30/01/23]

⁴⁸ Natural England (2003) Accessible Natural Green Space Standards in Towns and Cities. Available at: <http://publications.naturalengland.org.uk/publication/65021> [Date accessed: 20/01/23]

⁴⁹ DEFRA (2019) Natural Capital Committee advice to government on net environmental gain. Available at: <https://www.gov.uk/government/publications/natural-capital-committee-advice-to-government-on-net-environmental-gain> [Date accessed: 30/01/23]

⁵⁰ National Infrastructure Commission (2021) Natural Capital and Environmental Net Gain: A discussion paper. Available at: <https://nic.org.uk/studies-reports/natural-capital-environmental-net-gain/#:~:text=Environmental%20net%20gain%20is%20the,to%20the%20pre%2Ddevelopment%20baseline.&text=Biodiversity%20net%20gain%20is%20a,for%20achieving%20environmental%20net%20gain.> [Date accessed: 25/01/23]

| SLP Issues and Options Topics | SLP Issues and Options Questions | SA Commentary and Recommendations |
|-------------------------------|----------------------------------|---|
| | | <ul style="list-style-type: none"> • The SLP should promote the conservation and enhancement of the historic environment, ensuring that policies seek opportunities to enhance public understanding and enjoyment of heritage assets and locally important historic features. • The SLP should strive to protect and enhance the special qualities of locally important landscapes and remaining areas of open space, including the Rowley Hills and Sandwell Valley. SLP policies should support development in accordance with the findings of the Landscape Sensitivity Assessment⁵¹ and Green Belt Study⁵² prepared for the former BCP, or any future updates. • Development proposals should aim to protect areas identified as tranquil. An example method for identifying tranquillity includes 'Mapping Tranquillity'⁵³. • The Black Country Geopark provides an opportunity to promote tourism. Where tourism offerings are created or enhanced, the SLP policies should ensure that these are accessible for visitors and commit to enhancing conservation efforts and GI alongside tourism / economic benefits. |

⁵¹ LUC (2019) Black Country Landscape Sensitivity Assessment. Available at: https://blackcountryplan.dudley.gov.uk/media/13883/black-country-lsa-front-end-report-final-lr_redacted.pdf [Date accessed: 10/01/23]

⁵² LUC (2019) Black Country Green Belt Study. Available at: https://blackcountryplan.dudley.gov.uk/media/13882/bcgb-0919-black-country-gb-stage-1-and-2-plus-app1-final-reduced_redacted.pdf [Date accessed: 10/01/23]

⁵³ CPRE (2005) Mapping Tranquillity. Available at: <https://www.cpre.org.uk/resources/mapping-tranquillity/> [Date accessed: 20/01/23]

5 Conclusions and next steps

5.1 Consultation on the Regulation 18 Issues and Options SA Report

5.1.1 This Regulation 18 Issues and Options SA Report will be published by SMBC for consultation between 6th February and 20th March 2023.

5.1.2 All responses to this consultation exercise should be made in writing, either via the SMBC website <https://www.sandwell.gov.uk/sandwelllocalplan> or sent to:

The Planning Policy Team,
Sandwell Council,
PO Box 2374,
Oldbury,
B69 3DE

Email: Sandwell_LocalPlan@sandwell.gov.uk

5.1.3 This report represents the latest stage of the SA process. Any comments received on this report during the consultation will be considered and used to inform subsequent stages of the SA process, where appropriate.

5.1.4 Further consultations and opportunities to comment on the emerging SLP and accompanying SA outputs will occur at each plan making stage.

5.2 Next steps

5.2.1 Reasonable alternatives will be identified by SMBC and assessed through the SA process to enable options for the emerging SLP to be explored. This is likely to include options for the development strategy, policies, and development sites. In this way, the SA can provide a coherent 'story' of the SLP's evolution and choice of options by assessing reasonable alternatives prepared throughout the plan making process.

5.2.2 The assessment of options or reasonable alternatives is an important requirement of the SEA Regulations, which requires the Environmental Report to include *"an outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information"*.

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Appendix A – SA Framework

| # | SA Objective | Relevant SEA Regulations topics | Decision making criteria: Will the option / proposal... | Indicators (this list is not exhaustive) |
|---|--|--|--|---|
| 1 | Cultural heritage: Protect, enhance and manage sites, features and areas of archaeological, historical and cultural heritage importance. | <ul style="list-style-type: none"> Cultural heritage | a) conserve features of architectural or historic interest and, where necessary, encourage their conservation and renewal? b) conserve or enhance archaeological sites/remains? c) conserve or enhance the setting of cultural heritage assets? d) improve the energy efficiency of historic buildings? | <ul style="list-style-type: none"> Number and condition of historic assets on the Heritage at Risk register. Developments with potential to adversely affect cultural heritage designations or areas of historic value in the SLP area. Statutory and non-statutory sites in the Historic Environment Record (HER) and identified in the HLC. |
| 2 | Landscape: Protect, enhance and manage the character and appearance of the landscape and townscape, maintaining and strengthening local distinctiveness and sense of place. | <ul style="list-style-type: none"> Landscape Cultural heritage | a) safeguard and enhance the character of the landscape and local distinctiveness and identity? b) protect and enhance visual amenity, including light and noise pollution? c) reuse degraded landscapes/townscapes? d) compromise the purpose of the Green Belt e.g. will it lead to coalescence of settlements and/or urban sprawl? | <ul style="list-style-type: none"> Tranquillity rating of area. Re-use of brownfield land and/or derelict buildings. Developments with potential to alter existing landscape or townscape character. Developments in the Green Belt which contradict with the findings of the Green Belt Study. Developments in areas identified as being of 'moderate' or 'moderate-high' sensitivity in the Landscape Sensitivity Study. |
| 3 | Biodiversity, flora, fauna and geodiversity: Protect, enhance and manage biodiversity and geodiversity. | <ul style="list-style-type: none"> Biodiversity Flora Fauna | a) maintain and enhance features and assets of nature conservation value including biodiversity and geodiversity? b) support positive management of local sites (SLINCs and SINCS) designated for nature conservation and geodiversity value? c) contribute towards wider GI networks and promote habitat connectivity? d) deliver biodiversity net gain? | <ul style="list-style-type: none"> Number and diversity of protected species present in the area. Quality and extent of priority habitats (habitats of principle importance). Area and condition of sites designated for biological and geological interest. Provision and connectivity of GI. |

| # | SA Objective | Relevant SEA Regulations topics | Decision making criteria: Will the option / proposal... | Indicators (this list is not exhaustive) |
|---|---|--|--|--|
| | | | | <ul style="list-style-type: none"> Amount of biodiversity net gain provided in new developments measured using the DEFRA Biodiversity Metric. |
| 4 | Climate change mitigation: Minimise Sandwell's contribution to climate change. | <ul style="list-style-type: none"> Climatic factors | a) help to reduce the per capita carbon footprint of Sandwell? b) encourage renewable energy generation or use of energy from renewable or low-carbon sources? c) promote sustainable construction principles? d) help to reduce reliance on private car use? | <ul style="list-style-type: none"> Carbon emissions from domestic / industrial / commercial sources. Percentage of energy in the area generated from renewable sources. Proximity to, and frequency of, public transport links. Distance to local services and amenities. |
| 5 | Climate change adaptation: Plan for the anticipated levels of climate change. | <ul style="list-style-type: none"> Climatic factors Soil Water | a) avoid development in areas at high risk of flooding and seek to reduce flood risk? b) increase the coverage and connectivity of GI? c) promote use of technologies and techniques to adapt to the impacts of climate change? d) ensure that new development is resilient to the effects of extreme weather events? | <ul style="list-style-type: none"> Number of properties at risk of flooding. Area of new greenspace created per capita. Area and connectivity of GI. Implementation of adaptive techniques, such as SuDS and passive heating/cooling. |
| 6 | Natural resources: Protect and conserve natural resources. | <ul style="list-style-type: none"> Soil Water Material assets | a) utilise previously developed, degraded and under-used land? b) lead to the loss of the best and most versatile agricultural land? c) lead to the loss or sterilisation of mineral resources, or affect mineral working? | <ul style="list-style-type: none"> Re-use of previously developed or brownfield land. Area of potential BMV agricultural land lost to development. Development within groundwater SPZs. Proposed Mineral Safeguarding Area(s). |
| 7 | Pollution: Reduce air, soil, water and noise pollution. | <ul style="list-style-type: none"> Air Water Soil Human health | a) improve air quality and avoid generating further air pollution? b) conserve soil quality or help to remediate land affected by ground contamination? c) conserve and improve water quality? d) help to reduce noise pollution and protect sensitive receptors from existing ambient noise? | <ul style="list-style-type: none"> Number of exceedances in NO₂, PM₁₀ or PM_{2.5} annual mean objectives within Sandwell AQMA. Development with potential to generate a significant increase in road traffic emissions or other air pollutants. Area of contaminated land remediated. |

| # | SA Objective | Relevant SEA Regulations topics | Decision making criteria: Will the option / proposal... | Indicators (this list is not exhaustive) |
|----|---|---|--|--|
| | | | | <ul style="list-style-type: none"> Proximity to watercourses or groundwater receptors. Ecological and chemical status of waterbodies within the SLP area and downstream. Percentage change in pollution incidents. |
| 8 | Waste: Reduce waste generation and disposal and achieve the sustainable management of waste. | <ul style="list-style-type: none"> Population Material assets | a) encourage recycling, re-use and composting of waste? b) minimise and where possible eliminate generation of waste, during both construction and occupation of development? | <ul style="list-style-type: none"> Number and capacity of waste management facilities. Rate of recycling and composting. Management of local authority collected waste. |
| 9 | Transport and accessibility: Improve the efficiency of transport networks by increasing the proportion of travel by sustainable modes and by promoting policies which reduce the need to travel. | <ul style="list-style-type: none"> Climatic factors Population Material assets | a) reduce the need to travel and/or reduce travel time? b) provide adequate means of access by a range of sustainable transport modes (i.e. walking, cycling, and public transport)? c) support a modal shift away from private car use? | <ul style="list-style-type: none"> Proximity and connectivity of walking and cycling links. Proximity to public transport links including bus services, metro and rail. Frequency of bus services. Provision or expansion of public transport and active travel infrastructure. Distance / travel times to place of work, local amenities and key services. |
| 10 | Housing: Provide affordable, environmentally sound and good quality housing for all. | <ul style="list-style-type: none"> Population | a) provide a mix of good-quality housing, including homes that are suitable for first-time buyers? b) provide housing suitable for the growing elderly population? c) provide decent, affordable, and accessible homes? | <ul style="list-style-type: none"> Varied housing mix. Percentage of dwellings delivered as affordable housing. Number of extra care homes. Provision of pitches and plots for Gypsies, Travellers and Travelling Showpeople. |
| 11 | Equality: Reduce poverty, crime and social deprivation and secure economic inclusion. | <ul style="list-style-type: none"> Population Human health | a) eliminate unlawful discrimination, victimisation and harassment? b) reduce crime and the fear of crime? | <ul style="list-style-type: none"> Indices of Multiple Deprivation. Level of qualifications e.g. number. of people with NVQ2. Rates of crime. |

| # | SA Objective | Relevant SEA Regulations topics | Decision making criteria: Will the option / proposal... | Indicators (this list is not exhaustive) |
|----|--|---|---|---|
| | | | <ul style="list-style-type: none"> c) create safe neighbourhoods and support community cohesion? d) advance equality of opportunity? e) help to achieve life-long learning and increase learning participation and adult education? | <ul style="list-style-type: none"> • Provision of and access to community facilities including libraries and local centres. • Provision of accessible and adaptable homes to meet the needs of the population. |
| 12 | Health: Safeguard and improve community health, safety and wellbeing. | <ul style="list-style-type: none"> • Human health • Population | <ul style="list-style-type: none"> a) improve sustainable access for all to health, leisure and recreational facilities? b) improve and enhance Sandwell's GI network? c) improve road safety? d) consider the needs of Sandwell's growing elderly population? | <ul style="list-style-type: none"> • Travel time by active travel and/or public transport to healthcare facilities and services. • Provision and accessibility of open greenspace and GI. • Accessibility to sports facilities e.g. football pitches, playing fields, tennis courts and leisure centres. |
| 13 | Economy: Develop a dynamic, diverse and knowledge-based economy that excels in innovation with higher value, lower impact activities. | <ul style="list-style-type: none"> • Population • Material assets | <ul style="list-style-type: none"> a) improve sustainable access to employment opportunities? b) encourage business start-ups in the SLP area? c) protect and enhance the vitality and viability of existing employment and retail areas? d) protect and create jobs? | <ul style="list-style-type: none"> • Proximity and sustainable accessibility to employment opportunities. • Number of residents working within Sandwell, and rates of unemployment. • Number of new business start-ups as a result of the development. • Total amount of employment land. • Number of vacant units in strategic centres. |
| 14 | Education, skills and training: Raise educational attainment and develop and maintain a skilled workforce to support long-term competitiveness. | <ul style="list-style-type: none"> • Population | <ul style="list-style-type: none"> a) improve sustainable access for all to education and training opportunities? b) encourage a diversity of education and training opportunities? c) Support the provision of an appropriately skilled workforce? | <ul style="list-style-type: none"> • Proximity to education and training, particularly primary schools and secondary schools. • Provision of new education and training facilities and opportunities. • Accessibility of education and training facilities by public transport. • Capacity of local schools to meet demand from new development. |

Habitats Regulations Assessments

Sustainability Appraisals

Strategic Environmental Assessments

Landscape Character Assessments

Landscape and Visual Impact Assessments

Green Belt Reviews

Expert Witness

Ecological Impact Assessments

Habitat and Ecology Surveys



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