

Appendix F:

Walsall Site Allocation Document (SAD)

SAD Objectives: Updated Objectives Testing and Commentary (January 2016)

Revisions to the SAD Objectives in July 2015 are shown in Blue Text

Revisions to SAD Objectives 6, 9 and 10 in January 2016 are shown in Purple Text

SAD Objectives (January 2016) Testing Matrix - Outcomes														
Revised Walsall SAD Objectives	Revised Walsall SAD & AAP – SA Objectives (July 2015)													
	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
SAD OBJECTIVE 1 (NEW OBJECTIVE): To provide a regeneration strategy for Walsall that promotes sustainable growth within the existing urban areas whilst protecting the Green Belt from inappropriate development.	?	?	+	++	?	++	++	++	+	+	+	++	++	?
SAD OBJECTIVE 2 (REVISION OF PREVIOUS SAD OBJECTIVE 3): To deliver sustainable communities through the development of new housing on vacant, derelict, and under-used land (including redundant employment land), as well as the regeneration of existing housing areas to provide a range of homes that meet the needs of all members of the community.	?	+	+	++	+	++	++	+	+	+	+	++	++	?
SAD OBJECTIVE 3 (COMBINATION OF PREVIOUS SAD OBJECTIVES 1 AND 2): To allocate high quality employment land in the best locations, allowing existing businesses to expand and new businesses to locate in the Borough.	?	?	?	+	0	++	++	+	0	0	+	++	+	?
SAD OBJECTIVE 4: To encourage and direct investment of a suitable scale to Walsall’s local centres, meeting the needs of local communities.	+	0	++	+	+	++	++	++	+	+	+	+	++	?
SAD OBJECTIVE 5: To provide a high quality environment across Walsall and with links to surrounding areas, to enhance biodiversity and help to address climate change by defining integrated environmental networks, protecting the natural environment, promoting green infrastructure and improving access to areas of open space.	+	++	++	++	++	+	+	++	++	0	+	+	+	+

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
SAD OBJECTIVE 6: To enhance the built environment through the conservation of heritage assets and the wider historic environment whilst promoting good design that addresses the character of Walsall and helps provides safe and secure communities.	0	+	?	+	++	?	0	+	++	?	0	0	0	+
SAD OBJECTIVE 7: To improve accessibility in Walsall through the delivery of a first class transport network providing convenient and inclusive links within the borough and to surrounding areas, as well as supporting sustainable development.	+	0	+	+	0	+	+	+	0	0	+	0	++	0
SAD OBJECTIVE 8: To support and promote the provision of community services in accessible locations where they can serve all communities across Walsall.	0	0	0	++	0	+	++	++	0	0	0	0	++	0
SAD OBJECTIVE 9: To safeguard permitted waste management facilities and identify opportunities for new waste treatment, transfer and disposal facilities in employment areas and in other suitable and accessible locations, where operations will not have unacceptable harmful effects on health, the environment, amenity, or infrastructure.	0	0	0	0	0	+	0	0	0	++	+	+	0	0
SAD OBJECTIVE 10: To identify and safeguard mineral resources of local and national importance and mineral production and distribution infrastructure, and identify suitable sites and areas for production of secondary and recycled aggregates and mineral extraction, where operations will not have unacceptable harmful effects on health, the environment, amenity, or infrastructure.	0	-	?	?	?	+	?	0	-	++	0	?	-	?

Key to the Objectives Testing Matrix Outcomes	
Likely strong compatibility	++
Likely compatibility	+
Relationship likely to be neutral	0
Likely incompatibility	-
Likely strong incompatibility	--
Compatibility uncertain	?

Revised SAD and AAP SA Objectives (July 2015)

SA1	Air Quality - Minimise emissions of potentially harmful air pollutants from new development in Walsall and exposure of "sensitive receptors" to poor air quality in the parts of Walsall Borough where monitoring shows that the national air quality objectives for nitrogen dioxide (NO ₂) are not being met and/ or that there are high levels of other potentially harmful air pollutants
SA2	Biodiversity and Geodiversity - Conserve, protect, enhance and restore Walsall's biodiversity and geodiversity by ensuring that new development contributes towards the establishment of coherent and resilient ecological networks, makes provision for enhancement of biodiversity and geological conservation wherever possible, and does not harm the integrity of European Sites or cause further loss, harm or deterioration of designated sites, other important wildlife habitats, and geological features, or compromise existing ecological networks
SA3	Climate Change - Reduce Walsall's contribution towards climate change and adapt to the unavoidable effects of climate change on the Borough, by promoting developments that avoid, reduce or minimise emissions of harmful greenhouse gases, including carbon dioxide (CO ₂), and by identifying opportunities to mitigate the anticipated effects on key infrastructure and other important assets
SA4	Communities and Population - Support the development of strong, sustainable and inclusive communities in Walsall by developing well designed housing that meets current and future housing needs in locations that support the transition to a low carbon future and are resilient to the unavoidable effects of climate change, have a good standard of amenity and are accessible to existing and planned employment areas and social infrastructure; enable the development of appropriately located new social infrastructure where there is a need, and ensure that other new developments will have a positive effect on the quality of life for local communities, and will not be harmful to their amenity, health and well-being
SA5	Cultural Heritage - Conserve, protect and enhance Walsall's cultural heritage by encouraging better management of conservation areas and historic parks and gardens, by identifying appropriate, viable and beneficial uses for vacant historic buildings, and by ensuring that new development does not compromise the quality or character of heritage assets and their settings or destroy features or archaeology of national or local importance
SA6	Economy and Centres - Promote sustainable, low carbon economic growth and retain businesses and jobs in Walsall by identifying and safeguarding sufficient land for employment and training of the right quality in appropriate and accessible locations to meet the needs of local businesses and potential investors, without compromising the amenity of local communities or the operation of other businesses, by helping to address barriers to sustainable economic growth and investment where possible, such as providing new infrastructure where it is needed to support existing and future businesses, and by identifying opportunities for retail, office and leisure development in centres to meet anticipated requirements
SA7	Equality and Diversity - Reduce inequalities which result from social-economic disadvantage by ensuring that the diverse needs of communities in Walsall are met by planned housing and other developments, and ensure that groups or individuals with protected characteristics, as defined in the Equalities Act 2010, do not suffer direct or indirect discrimination as a result of policies that are included or omitted, including ensuring that developments intended for use specifically by protected or disadvantaged groups, or by them in conjunction with others, are in accessible locations, which are not exposed to significant environmental problems and are likely to be resilient to climate change effects
SA8	Health and Wellbeing - Improve the health and well-being of Walsall residents and address health inequalities by ensuring that new development supports healthy lifestyles and wellbeing and does not present unacceptable risks to the health, safety and wellbeing of local communities and people who visit Walsall for work, shopping or leisure, by developing new health and social care facilities where there is a need, and by ensuring that health and social care facilities are accessible to those they are meant to serve and are likely to be resilient to climate change effects
SA9	Landscape and Townscape - Conserve, protect and enhance the landscape and townscape by developing an environmental infrastructure network for Walsall that protects valued areas and provides opportunities to improve areas of lesser quality, and by ensuring that new development is well designed, of a type and scale appropriate to its surroundings, and respects the character of buildings, spaces and other features where they contribute positively to the environment
SA10	Material Resources - Use Walsall's material resources prudently and efficiently by safeguarding mineral resources and mineral and waste infrastructure, by addressing identified mineral supply requirements, by supporting proposals that would reduce waste and manage unavoidable waste in accordance with the "waste hierarchy," and by enabling the provision of the infrastructure needed for treatment, transfer and disposal of waste and manufacture and distribution of mineral products in appropriate locations, where operations will not endanger human health, or cause unacceptable harm to the environment, or the amenity and wellbeing of local communities
SA11	Renewable and Low Carbon Energy - Reduce Walsall's reliance on non-renewable, carbon based energy sources, by minimising energy consumption, by increasing the capacity available to generate energy and fuel from renewable and low carbon sources including waste that cannot be re-used or recycled, by identifying opportunities for co-location of new energy generating infrastructure near to complementary land uses where there is scope to use residual heat, and by delivering more affordable, secure and reliable supplies of energy to local communities and businesses, in ways that will not generate harmful pollutants or have other adverse effects on the environment, and will be resilient to climate change effects
SA12	Soil and Ground Conditions - Maintain and improve the quality of Walsall's soils and land, by avoiding development of greenfield land, including the "best and most versatile" agricultural land, where previously-developed land or lesser quality greenfield land is available, by encouraging development likely to use soils, land and buildings efficiently, re-use or recycle construction, demolition and excavation wastes, and bring previously developed and derelict land back into beneficial use, and by ensuring that new development deals with existing contamination and geotechnical problems and does not exacerbate existing problems or cause such problems on land not already affected
SA13	Transport and Accessibility - Deliver the transport infrastructure required to improve connectivity, reduce congestion and support economic growth in Walsall and adjoining parts of the West Midlands urban area, reduce the vulnerability of transport infrastructure to climate change effects, reduce the impacts of transport on the environment and on the health, amenity and well-being of local communities, and ensure that new employment and social infrastructure is accessible to local people by a choice of transport modes, and encourages them to make smarter and healthier transport choices
SA14	Water Environment - Conserve and protect Walsall's water resources, maintain water quality and reduce the risk of flooding, by minimising water consumption, by avoiding development in areas where water resources are present or areas at risk of flooding, by ensuring that new development will not have adverse impacts on hydrology or water treatment and supply infrastructure, including increasing vulnerability of such infrastructure to climate change effects, and that any waste water likely to be generated by new development can be managed in ways that minimise the risk of flooding and pollution of surface and groundwater

Revised SAD Objectives (January 2015) Testing - Commentary

<p>SAD OBJECTIVE 1 (NEW OBJECTIVE): To provide a regeneration strategy for Walsall that promotes sustainable growth within the existing urban areas whilst protecting the Green Belt from inappropriate development.</p>	<p>This is a new overall objective for the SAD that is as much about the contribution of Walsall to wider objectives as it is within the Borough itself. No areas of definite tension have been identified between this new SAD Objective and the SA objectives: in fact, in the overall sense, the regeneration strategy improves the sustainable settlement pattern, the efficient use of land, and the social cohesion of the Borough. Furthermore, the provision of an improved sustainable settlement pattern and economic regeneration within Walsall, as a prominent part of the West Midlands Metropolitan area (the biggest in the UK outside London), itself contributes to progress on wider UK objectives in relation to economic rebalancing, social cohesion, air quality and carbon reduction. There are however some uncertainties relating to impacts on SA Objectives for air quality, the historic environment, biodiversity and water resources, as concentrating development in the urban area could create tensions with those objectives. However, in most cases tensions are likely to be relatively minor compared with the very large overall benefits of an improved sustainable settlement pattern and concentrated development within the urban area, compared with the alternative sprawl-based development that would work against social, economic and environmental objectives, both locally and nationally.</p>
<p>SAD OBJECTIVE 2 (REVISION OF PREVIOUS SAD OBJECTIVE 3): To deliver sustainable communities through the development of new housing on vacant, derelict, and under-used land (including redundant employment land), as well as the regeneration of existing housing areas to provide a range of homes that meet the needs of all members of the community.</p>	<p>No areas of definite tension have been identified between the new SAD Objective 2 and the SA Objectives. Re-using vacant, derelict and under-used land and buildings is the most sustainable option when measured against most indicators. Some vacant and derelict land that might be developed for new housing lies in areas where limit values for emission of nitrogen dioxide are being breached, or are in areas at risk of flooding, so effects on SA Objectives 1 and 14 are uncertain. However, such sites are likely to be more accessible by public transport than greenfield sites. Developing the latter is likely to encourage greater car dependency and increase pollution, causing greater conflict with the SA Objectives.</p>
<p>SAD OBJECTIVE 3 (COMBINATION OF PREVIOUS SAD OBJECTIVES 1 AND 2): To allocate high quality employment land in the best locations, allowing existing businesses to expand and new businesses to locate in the Borough.</p>	<p>No areas of definite tension have been identified between the new SAD Objective 3 and the SA Objectives. The re-use of vacant, derelict and under used land for economic development purposes will deliver dividends in relation to sustainability, social cohesion and economic efficiency, given that the identified economic opportunities are close to suppliers, the labour force and concentrated in areas of economic and social deprivation. Any potential impacts on the amenity of residents from introducing some employment uses into new areas would be addressed by the modification of SA Objective 6 to make specific reference to avoiding harmful effects, which can be achieved through design and planning conditions. However, as some employment sites are near to canal corridors, in areas at potential risk from flooding or near to Areas of NO2 Exceedance, there are uncertainties in relation to the relationship of this SAD Objective to the SA Objectives 1, 2, 3 and 14.</p>
<p>SAD OBJECTIVE 4: To encourage and direct investment of a suitable scale to Walsall's local centres, meeting the needs of local communities.</p>	<p>No areas of definite tension have been identified between SAD Objective 4 and the SA Objectives. Directing investment to existing local centres is likely to be the most sustainable option in terms of impacts on carbon dioxide emissions, accessibility and the local economy compared to alternative objectives which would allow greater flexibility over where "town centre" development could locate. SAD Objective 4 is therefore complimentary towards most of the SA Objectives, in particular, SA Objectives 3, 6, 7, 8 and 13. However, there may be some uncertainty about relationship to SA Objective 14, given that some local centres are in areas at risk from flooding, although there is scope for development to include mitigation to reduce flood risk, therefore there need not necessarily be a tension between the two objectives.</p>
<p>SAD OBJECTIVE 5: To provide a high quality environment across Walsall and with links to surrounding areas, to enhance biodiversity and help to address climate change by defining integrated environmental networks, protecting the natural environment, promoting green infrastructure and improving access to areas of open space.</p>	<p>No areas of tension have been identified between SAD Objective 5 and the SA Objectives. Providing attractive areas of open space and "green" networks will particularly complement SA Objectives towards biodiversity, cultural heritage, climate change mitigation, access to key facilities and services, health and wellbeing, landscape character and the water environment (SA Objectives 2, 3, 4, 5, 8, 9 and 14) and is also likely improve access to open space for communities that do not currently have adequate access, and to encourage walking and cycling, in support of SA Objectives 7 and 13.</p>
<p>SAD OBJECTIVE 6: To enhance the built environment through the conservation of heritage assets and the wider historic environment whilst promoting good design that addresses the character of Walsall and helps provides safe and secure communities.</p>	<p>No areas of definite tension have been identified between SAD Objective 6 and the SA Objectives. Enhancing the existing built environment and conservation of heritage assets will particularly complement SA Objectives towards cultural heritage, townscape and landscape (SA Objectives 5 and 9). The SAD Objective also complements SA Objectives towards conservation of the natural environment, promotion of sustainable communities, health and wellbeing and the water environment (SA Objectives 2, 4, 8 and 14). The relationship with SA Objectives 3 and 6 are uncertain, because conserving historic buildings is not always economically viable, and some historic assets in Walsall are in areas at risk from flooding and are potentially vulnerable to climate change effects. There could also be a tension between this objective and SA Objective 10, although this is not certain, as it is often possible to avoid, reduce or mitigate the effects of mineral extraction on archaeology and other heritage assets. The relationship to SA Objective for air quality is overall likely to be net neutral because conserving heritage assets is not likely to increase emissions of air pollutants. Relationship to SA Objectives 7 and 11 is also overall neutral, as although it can be difficult to make historic buildings accessible to people with some disabilities and energy efficient, new well-designed buildings will address these issues and many people will benefit overall from having a high quality environment. Relationship to SA Objective 12 is also likely to be neutral as conservation is less likely to involve ground disturbance and exacerbation of ground condition problems than new development, and well designed new buildings will also address any problems present. Conserving and enhancing the built environment is also likely to have overall net neutral impacts on objectives towards transport (SA Objective 13).</p>

<p>SAD OBJECTIVE 7: To improve accessibility in Walsall through the delivery of a first class transport network providing convenient and inclusive links within the borough and to surrounding areas, as well as supporting sustainable development.</p>	<p>No areas of tension have been identified between SAD Objective 7 and the SA Objectives. The objective could be particularly beneficial towards SA Objective 13, assuming that the objective seeks to deliver a network that will maximise use of rail freight, public transport, walking and cycling to move people, goods and services around the borough and beyond, and rather than encouraging the continued use and further expansion of the road transport network.</p>
<p>SAD OBJECTIVE 8: To support and promote the provision of community services in accessible locations where they can serve all communities across Walsall.</p>	<p>No areas of tension have been identified between SAD Objective 8 and the SA Objectives. Delivering community facilities in accessible locations - particularly where local people can get access to them using existing public transport, walking and cycling networks - will complement objectives towards sustainable transport and is also more likely to deliver reductions in emissions from road transport and benefits to health from walking and cycling than alternative objectives which would allow greater flexibility over where these facilities could locate. SAD Objective 8 is therefore complimentary towards most of the SA Objectives, and in particular, SA Objectives 3, 4, 7, 8 and 13.</p>
<p>SAD OBJECTIVE 9: To safeguard permitted waste management facilities and identify opportunities for new waste treatment, transfer and disposal facilities in employment areas and in other suitable and accessible locations, where operations will not have unacceptable harmful effects on health, the environment, amenity, or infrastructure.</p>	<p>No areas of tension have been identified between Revised SAD Objective 9 and the Revised SA Objectives. It is particularly complimentary towards Revised SA Objective 10 which seeks to manage unavoidable waste in accordance with the "waste hierarchy" and in appropriate locations, where operations will not endanger health or harm the environment or amenity. It is also likely to be complimentary towards Revised SA Objectives 6, 11 and 12 given that Revised SA Objective 6 seeks to provide the infrastructure needed to support economic growth, which would include waste management infrastructure, and the Objective also does not exclude any types of waste management facility and would therefore aim to provide facilities for recovery of energy from residual waste and for managing excavation waste including contaminated soils, in support of SA Objectives 11 and 12. As the SAD Objective is to identify opportunities for new waste management facilities in appropriate and accessible locations, and we must assume that they would be properly regulated and well managed, it is considered to have a neutral relationship to the other SA Objectives.</p>
<p>SAD OBJECTIVE 10: To identify and safeguard mineral resources of local and national importance and mineral production and distribution infrastructure, and identify suitable sites and areas for production of secondary and recycled aggregates and mineral extraction, where operations will not have unacceptable harmful effects on health, the environment, amenity, or infrastructure.</p>	<p>Although the Revised SAD Objective 10 seeks to protect the environment, it still supports mineral extraction, so there remains a tension between the Revised SAD Objective and the Revised SA Objectives which relate to aspects of the environment where harmful effects from mineral extraction are likely to be difficult to control. However, the Revised SAD Objective is particularly complementary towards Revised SA Objective 10 which supports sustainable use and production of mineral resources, and is also complementary towards Revised SA Objective 6. Mineral resources can only be extracted where they are found, so there is very limited choice over where mineral extraction can take place - working resources in Walsall means less reliance on importing the raw materials needed to support economic growth from other areas, although this is likely to put more pressure on local transport networks, leading to potential conflict with Revised SA Objective 13. The mineral resources in Walsall that are most likely to be economic to work are underlying greenfield sites in the Green Belt, some of which are of importance for biodiversity and local landscape character, thereby bringing SAD Objective 10 into conflict with SA Objectives 2 and 9. Impacts on air quality, climate change mitigation, local communities, cultural heritage and hydrology are less certain, as in many cases, impacts would be localised and temporary, and mitigation is likely to be feasible, although it is questionable whether mitigation would in all cases be sufficient to avoid significant harmful effects. The relationship to SA Objective 12 is likely to be negative in the short-term, but probably neutral in the long-term, provided that mineral extraction sites are well restored to a standard that does not create any geotechnical problems for the future.</p>